EXHIBIT ATTACHMENTS TO
MOTION OF THE PUBLIC ADVOCATES OFFICE
FOR AN ORDER COMPELLING DATA REQUEST RESPONSES
AND IMPOSING SANCTIONS ON
PACIFIC GAS AND ELECTRIC COMPANY

Index of Exhibit Attachments

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<thead>
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<th>Exhibit</th>
<th>Title/Description</th>
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<td>A</td>
<td>Public Advocates Office Data Request, CalAdvocates-PGE-NonCase-AWM-09302021A, dated September 30, 2021 (“Cal Advocates’ DR”)</td>
</tr>
<tr>
<td>B.1</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q01 [sic], dated October 14, 2021 (“PG&amp;E response to Cal Advocates’ DR Question 1”)</td>
</tr>
<tr>
<td>B.2</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q02 [sic], dated October 14, 2021 (“PG&amp;E response to Cal Advocates’ DR Question 2”)</td>
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<td>B.3</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q03 [sic], dated October 14, 2021 (“PG&amp;E response to Cal Advocates’ DR Question 3”)</td>
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<td>B.4</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q04 [sic], dated October 14, 2021 (“PG&amp;E response to Cal Advocates’ DR Question 4”)</td>
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<td>B.5</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q05 [sic], dated October 14, 2021 (“PG&amp;E response to Cal Advocates’ DR Question 5”)</td>
</tr>
<tr>
<td>D</td>
<td>October 6, 2021 Email from Rachel Gallegos for Arocles Aguilar, General Counsel</td>
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<td>E</td>
<td>October 21, 2021 Email from Carolyn Chen for Public Advocates Office</td>
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<td>G</td>
<td>October 25, 2021 Email from Charles Middlekauff for PG&amp;E</td>
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<td>H</td>
<td>October 26, 2021 9:40 a.m. Email from Carolyn Chen for Public Advocates Office</td>
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<td>I</td>
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<td>K</td>
<td>November 2, 2021 Email from Charles Middlekauff for PG&amp;E</td>
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<td>L.1</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q03Rev01 [sic], dated November 5, 2021 (“Revised PG&amp;E response to Cal Advocates’ DR Question 3”)</td>
</tr>
<tr>
<td>L.2</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q03Rev01Atch01 [sic], dated November 5, 2021, 2021 Wildfire Mitigation Plan Approval (“Revised PG&amp;E response to Cal Advocates’ DR Question 3 attachment”)</td>
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<tr>
<td>M</td>
<td>Pacific Gas and Electric Company Non-Case Discovery Data Response, Non-CaseDiscovery_DR_CalAdvocates_077-Q02Rev01, dated November 12, 2021 (“Revised PG&amp;E response to Cal Advocates’ DR Question 2”)</td>
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<td>N</td>
<td>Public Advocates Office Data Request, CalAdvocates-PGE-NonCase-MK3-11192021, dated November 19, 2021 (“November 19, 2021 Cal Advocates’ DR”)</td>
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PUBLIC ADVOCATES OFFICE DATA REQUEST
Proceeding: Non-Case Discovery
No. CalAdvocates-PGE-NonCase-AWM-09302021A

Date: September 30, 2021
Response requested: October 14, 2021

To:
Spencer Olinek
Pacific Gas and Electric Company
Email: Spencer.Olinek@pge.com

Alyssa Koo
Pacific Gas and Electric Company
Email: Alysa.Koo@pge.com

Charles Middlekauff
Pacific Gas and Electric Company
Email: Charles.Middlekauff@pge.com

Regulatory Relations
Pacific Gas and Electric Company
Email: RegRelCPUCases@pge.com

From:
Alan Wehrman
Utilities Engineer
Public Advocates Office
Phone: (415) 696-7319
Email: Alan.Wehrman@cpuc.ca.gov

Carolyn Chen
Attorney
Public Advocates Office
Phone: (415) 703-1980
Email: Carolyn.Chen@cpuc.ca.gov
INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each Data Request prior to providing the response. Identify the person providing the answer to each Data Request and their contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Matthew.Karle@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, at least 3 days before the response to the Data Requests is due and provide your best estimate of when the information can be provided. Please identify the person who will be providing the response and their phone number and email address.

Responses should be provided in the original electronic format, if available, and if not available, in hard copy. (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 these Data Requests should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the Data Requests should be Bates-numbered and, if voluminous, indexed. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office at least 3 days before the response to the Data Requests is due. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

A. As used herein, the terms “you,” “your(s),” “Company,” and “PG&E” mean Pacific Gas and Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.

B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.

C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st
of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.

E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these Data Requests.

G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.

H. “Identify”:

i. When used in reference to a person, includes stating their full name, most recent known business address and telephone number, and present title or position;

ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.

J. “CPUC” means California Public Utilities Commission.

K. “Cal Advocates” means the Public Advocates Office.

L. “HFTD” means High Fire Threat District.

M. “WMP” means Wildfire Mitigation Plan.

**DATA REQUESTS**

**Question 1**

Please provide a list of all meetings and presentations held since July 1, 2021 between PG&E and the Office of Energy Infrastructure Safety (Office of Energy Safety) related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance.

**Question 2**

Please provide the dates of all meetings and presentations held since July 1, 2021 between PG&E and any Commissioners of the CPUC or staff of the Commissioners of the CPUC, related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance. If this information is already provided in a filed notice of ex parte communications, you may refer to such document.

**Question 3**

For all meetings and presentations listed in response to Question 1 and Question 2, please provide relevant materials. This may include, but is not limited to:
• Meeting agendas
• Meeting minutes
• Meeting transcripts
• Copies of presentations
• Copies of documents presented or discussed

If any requested material was already provided in a filed notice of *ex parte* communications, you may refer to such document.

**Question 4**

Please provide copies of any data requests and PG&E’s responses, if any, resulting from any meetings and presentations listed in response to Question 1 from the Office of Energy Safety, the CPUC Wildfire Safety Division, a CPUC Commissioner’s Office, and a staff member of a division of the CPUC, except for Cal Advocates.

**Question 5**

Please provide copies of any data requests and PG&E’s responses, if any, resulting from any meetings and presentations listed in response to Question 2 from the Office of Energy Safety, the CPUC Wildfire Safety Division, a CPUC Commissioner’s Office, and a staff member of a division of the CPUC, except for Cal Advocates.

END OF REQUEST
QUESTION 01

Please provide a list of all meetings and presentations held since July 1, 2021 between PG&E and the Office of Energy Infrastructure Safety (Office of Energy Safety) related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance.

ANSWER 01

PG&E objects to this request on the basis of relevance and because it is overly broad and burdensome. The Office of Energy Safety (OEIS) was created by California statutory law. It is unclear the relevance of the information requested to the Public Advocates Office and thus this request is objectionable on the basis of relevance and breadth. In addition, this request is objectionable because it is burdensome.
QUESTION 02

Please provide the dates of all meetings and presentations held since July 1, 2021 between PG&E and any Commissioners of the CPUC or staff of the Commissioners of the CPUC, related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance. If this information is already provided in a filed notice of ex parte communications, you may refer to such document.

ANSWER 02

PG&E objects to this request on the basis of relevance and because it is overly broad and burdensome. This request seeks all communications between CPUC Commissioners and/or CPUC Staff related to wildfire safety or wildfire mitigation efforts. It is unclear the relevance of the information requested to the Public Advocates Office and thus this request is objectionable on the basis of relevance and breadth. In addition, this request is objectionable because it is burdensome. Finally, to the extent communications, if any, occurred with CPUC Commissioners and/or their advisors and these communications required an ex parte notice consistent with the Rules of Practice and Procedure, an ex parte notice has been filed and is thus equally available to the Public Advocates Office.
PACIFIC GAS AND ELECTRIC COMPANY
Non-Case Discovery
Data Response

<table>
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<tr>
<th>PG&amp;E Data Request No.:</th>
<th>CalAdvocates_077-Q03</th>
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<tr>
<td>PG&amp;E File Name:</td>
<td>Non-CaseDiscovery_DR_CalAdvocates_077-Q03</td>
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<td>Request Date:</td>
<td>September 30, 2021</td>
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<td>Requester DR No.:</td>
<td>NonCase-AWM-09302021A</td>
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<tr>
<td>Date Sent:</td>
<td>October 14, 2021</td>
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<td>Requesting Party:</td>
<td>Public Advocates Office</td>
</tr>
<tr>
<td>PG&amp;E Witness:</td>
<td>Requester: Alan Wehrman</td>
</tr>
</tbody>
</table>

**QUESTION 03**

For all meetings and presentations listed in response to Question 1 and Question 2, please provide relevant materials. This may include, but is not limited to:

- Meeting agendas
- Meeting minutes
- Meeting transcripts
- Copies of presentations
- Copies of documents presented or discussed

If any requested material was already provided in a filed notice of *ex parte* communications, you may refer to such document.

**ANSWER 03**

Please see PG&E’s objections to Questions 1 and 2.
QUESTION 04

Please provide copies of any data requests and PG&E’s responses, if any, resulting from any meetings and presentations listed in response to Question 1 from the Office of Energy Safety, the CPUC Wildfire Safety Division, a CPUC Commissioner’s Office, and a staff member of a division of the CPUC, except for Cal Advocates.

ANSWER 04

Please see PG&E’s objections to Questions 1 and 2.
QUESTION 05

Please provide copies of any data requests and PG&E’s responses, if any, resulting from any meetings and presentations listed in response to Question 2 from the Office of Energy Safety, the CPUC Wildfire Safety Division, a CPUC Commissioner’s Office, and a staff member of a division of the CPUC, except for Cal Advocates.

ANSWER 05

Please see PG&E’s objections to Questions 1 and 2.
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA


Rulemaking 18-10-007

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
THREE-DAY ADVANCE NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.2 (c)(2) of the California Public Utility Commission’s Rules of Practice and Procedure, notice is hereby given that Pacific Gas and Electric Company (PG&E) has been granted an *ex parte* meeting on the above captioned proceeding.

The oral communication will take via electronic telepresence on Friday, October 8, 2021 at approximately 3:00 PM with Commissioner Martha Guzman Aceves’ Chief of Staff, Jonathan Koltz, and Energy Advisor, Kerry Fleisher. Participating for PG&E will be Sumeet Singh, Senior Vice President and Chief Risk Officer, Wildfire Risk; Meredith Allen, Senior Director, and Spencer Olinek, Manager, Regulatory Relations.

Respectfully submitted,

/s/ Sidney Bob Dietz II
Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
P.O. Box 770000, Mail Code B23A
San Francisco, CA 94177
Phone: 415-209-3654
E-mail: Sidney.Dietz@pge.com

Dated: October 5, 2021
Chen, Carolyn

From: Gallegos, Rachel
Sent: Wednesday, October 6, 2021 2:32 PM
To: CLyons@sdge.com; CManzuk@SempraUtilities.com; JYork@SempraUtilities.com; KGill@SDGE.com; LFulton@sdge.com; NJasso@SempraUtilities.com; CentralFiles@SempraUtilities.com; swoldegiorgis@sdge.com; CentralFiles@SempraUtilities.com; Eric.Cardella@bves.com; marc.stern@bves.com; Paul.Marconi@bves.com; jaybarkman@ocfa.org; jesus.g.roman@verizon.com; CCostan@pacbell.net; ATC@ActonTownCouncil.org; skeehn@mbcommunitypower.org; DKarpa@PeninsulaCleanEnergy.com; Sue.Mara@RTOadvisors.com; imandelbaum@smcgov.org; AGraf@AdamsBroadwell.com; MDJoseph@AdamsBroadwell.com; MMaurino@AdamsBroadwell.com; diana.s.genasci@sce.com; Tara.Kaushik@sce.com; Louie, Aaron; Wehrman, Alan; Yip-Kikugawa, Amy C.; Durvasula, Anand; ab6@cpuc.ca.gov; Yang, Anna; Mulqueen, April; Fisher, Arthur (Iain); Korpics, Brian; Morey, Candace; Contreras, Carolina; Chen, Carolyn; Fogel, Cathleen A.; Lee, Chasel; Lukins, Chloe; Chow, Christopher; Hogan, Christopher; Parkes, Christopher; Rizzo, Colin; Goldberg, Daphne; Lee, Diana; Podolinsky, Elizabeth; Ermann, Gary C.; Sweat, Henry; Ormond, Jamie; Reiger, J. Jason; Koltz, Jonathan; Steingass, Joyce; Rahman, Junaid; Hagler, Justin; Shea, Karen M.; Nguyen, Karin; Stockton, Katherine; Yang, Kenneth; Palmer, Leslie L.; Tesfai, Leuwan; Morgans, Lucy; Divina, Marianne; Foudhe, Masoud; Yergovich, Matthew; Yunge, Matthew; Chupkov, Maya; Young, Megan; Gordon, Miles; Skinner, Nathaniel; Hawkins, Nora; Tse, Rickey; Thomas, Sarah R.; Simon, Sean A.; Casazza, Suzanne; Harahsheh, Talal; Drew, Tim G.; Burns, Truman L.; Holzschuh, Tyler; Kao, Valerie; Baldwin, Vanessa; William.Sanders@SFCityAtty.org; JCapitolo@CalWaterAssn.com; EBorden@turn.org; KMorsony@turn.org; Marcel@turn.org; BFinkelstein@turn.org; Ariel@UtilityAdvocates.org; AVCrawford@AkinGump.com; JQCh@pge.com; scott.castro@nee.com; Charles.Middlekauff@pge.com; EOCcommitments@pge.com; GRSL@pge.com; ServiceList.cpuc@PerkinsCoie.com; Jane.Whang@Verizon.com; Jessica.Basilio@pge.com; Joel.Crane@pge.com; julie.tan@pge.com; LJH2@pge.com; MEAe@pge.com; MCade@Buchalter.com; WSO3@pge.com; taylor.storer@pge.com; TDM9@pge.com; Tyson.Smith2@pge.com; Viktoriya.Malkina@pge.com; L Rafii@Buchalter.com; Fassil.T.Fenikile@att.com; jeffrey.mondon@att.com; joshua.mathisen@att.com; AnnaFero@dwt.com; BCragg@GoodinMacBride.com; Buck.Endemann@KLGates.com; DavidHuang@dwt.com; emily.lieban@hklaw.com; JimTomlinson@dwt.com; JWHamilton@Winston.com; Katie.Jorrie@dwt.com; bcgpolicylists@bcg.com; Kevin.Ashe@HKlaw.com; MSchreiber@cwcLaw.com; MDay@GoodinMacBride.com; Patrick.Ferguson@dwt.com; stevegreenwald@dwt.com; Tahiya.Sultan@dwt.com; TBrunello@outlook.com; Trina.Horner@Navigant.com; Vidhya.Prabhakaran@dwt.com; DWTcpucDockets@dwt.com; Suzanne.Toller@dwt.com; Allie@Reimagine-Power.com; steven@moss.net; Mavis@NewsData.com; Rachelle@ChongLaw.net; Deborah.Behles@gmail.com; Deborah.Behles@gmail.com; RegRelcpucCases@pge.com; WVM3@pge.com; Petra.Bruggisser@sonoma-county.org; MNeher@CCwater.com; Brett.Kawakami@EBmud.com; Avis.Kowalewski@Calpine.com; Katherine.Piper@Calpine.com; MPrestwich@CityofStHelena.org; galamberg@petersonpower.com; Benjamin.Bodell@bbklaw.com; AHarron@HarronLLC.com; Margaret.miller@Engie.com

Subject: Resolutions and Ex Parte Rules

Dear members of R.18-10-007 service list:

It has come to the attention of Legal Division that parties are reporting ex parte communications regarding resolutions that do not fall within the scope of this proceeding. The June 25, 2021 Order Extending the Statutory Deadline stated that the proceeding would remain open only to “ensure a smooth transition of all work from R.18-10-007 to the [Wildfire Safety Division], which will be located in the Office of Energy Infrastructure as of July 1, 2021, as well as to provide final clarifications on the potential pending issues.” The resolutions referenced by parties are not part of this
As Draft Resolution WSD-021 states, “... this Resolution is issued outside of a formal proceeding ...”. In general, issuance of a resolution does not trigger application of the Commission’s ex parte rules, which, pursuant to Rules of Practice and Procedure, Rule 8.1, apply only to formal proceedings. As such, any communications regarding resolutions are not subject to the Commission’s ex parte rules.

The Legal Division understands and is supportive of the fact that entities may wish to notice a meeting with a decisionmaker in the interests of transparency, as opposed to mandatory ex parte obligations. This practice is allowable and does not trigger any ex parte obligations by other entities or decisionmakers.

Best Regards,

Arocles

Ms. Arocles Aguilar
General Counsel
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

(415) 703-2015
(415) 703-4592 (FAX)

Due to the number of recipients on the service list, this notice is being sent in batches
Hi Spencer and Charles,

Hope all is well. Can we have a meet and confer to discuss PG&E’s responses in PG&E Non-Case Data Response CalAdvocates_077 and whether PG&E will reconsider its responses? I’m available tomorrow, Friday, 10/22, afternoon, and Monday, 10/25, late morning and afternoon. Please let me know what times during any of those windows you and/or the appropriate attendees are available.

Many thanks in advance for taking the time.

-Carolyn

Carolyn Chen (she/her)
Attorney, Legal Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA  94102-3298
Phone: (415) 703-1980
Email: carolyn.chen@cpuc.ca.gov

The information contained in this email communication, and any file(s) attached to it, may be confidential and may contain attorney/client-privileged information or work product. If the reader of this email is not the intended recipient (or the authorized agent responsible for delivering this email to the intended recipient), you have received this in error, and any review, dissemination, distribution or other use of this email is strictly prohibited. If you have received this email in error, please notify the sender by reply email and delete all copies of this email from your system. Thank you.
Please see attached PG&E’s responses to Cal Advocates data request “CalAdvocates-PGE-NonCase-AWM-09302021A”; PG&E Non-Case Discovery, CalAdvocates_077, dated October 14, 2021.

For questions regarding this response, please send inquiries to Spencer Olinek (spencer.olinek@pge.com).

Taylor Storer
Pacific Gas and Electric Company
Case Coordinator | Regulatory Affairs
925.989.8397 | taylor.storer@pge.com
Charles,

Thank you and Spencer for meeting and conferring with us today regarding PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A).

Per our meeting today, at this time, Cal Advocates is willing to limit the data request CalAdvocates-PGE-NonCase-AWM-09302021A, to the following:

1. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 3-5, for meetings you indicated PG&E would be willing to provide materials for, including
   - (a) PG&E’s May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS’s Draft Action Statement, and
   - (b) PG&E’s October 8, 2021, meeting with Commissioner Guzman Aceves’s Office regarding the Wildfire Mitigation Plan, as noticed in PG&E’s October 5, 2021 notice sent to the R.18-10-007 service list.

2. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 1 and 2. After we receive answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

*NOTE:

For purposes of this set of data requests, a “meeting” or “presentation” includes phone, video, or in-person meetings, conferences, discussions, or presentations that are substantive in nature. By “substantive,” we mean not “procedural matters” as defined in the Commission’s Rules of Practice and Procedure, such as Rule 8.1(e), and regardless of whether such meeting or presentation was within or outside a formal Commission proceeding, and before the OEIS for those questions about meetings/presentations with OEIS.

Please let me know by 11 a.m. tomorrow Tuesday, October 26, whether PG&E will agree to provide these data requests above timely. If I do not hear an answer from you then, we will proceed with motions to compel and for sanctions. Thanks for your cooperation.

Sincerely,
Carolyn Chen
Wonderful. I’ll send the meeting request for 11:00 a.m. soon. I’ll block out an hour just in case we need it, but I don’t expect it to take the full block of time. Thank you.

- Carolyn

11:00 a.m. works great for Monday (10/25).

If you can send a meeting invite, that would be great.

Have a good weekend.

Hi Charles,

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Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Friday, October 22, 2021 6:36 AM
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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For questions regarding this response, please send inquiries to Spencer Olinek (spencer.olinek@pge.com).

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Thus, I have two requests. First, I would like to talk further about the proposal below to understand what Cal Advocates is proposing. Second, once we receive further clarification, we would like 24 hours to make a decision. As you indicated today, there is not a proceeding pending that this information will be used for, nor to my knowledge is there a deadline that is upcoming for which Cal Advocates needs these materials (e.g., testimony, etc.). Thus, allowing us 24 hours to consider your proposal and respond, after receiving further clarification, seems entirely reasonable.

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Please let me know by 11 a.m. tomorrow Tuesday, October 26, whether PG&E will agree to provide these data requests above timely. If I do not hear an answer from you then, we will proceed with motions to compel and for sanctions. Thanks for your cooperation.

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Carolyn Chen (she/her)
Attorney, Legal Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
Phone: (415) 703-1980
Email: carolyn.chen@cpuc.ca.gov

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Chen, Carolyn

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To: Middlekauff, Charles (Law); Olinek, Spencer  
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Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles:

Thank you for responding and your efforts to get clarity. I am available to talk today. Please feel free to call me at 818-357-7451. Also, may I suggest emailing your question(s) to us, which may help clarify anything you are unclear about and so we don’t have to wait until you and I coordinate a call to hear what you need clarity about? While there is no set deadline in a proceeding we are working against, we do not want to delay this any further as it is important to the public. As we all agreed yesterday, the fact that PG&E’s actions – for whatever reason – got us to this meet and confer stage is unfortunate, given that that throughout this process PG&E has always had the ability to ask for clarity and communicate with us informally, sooner.

I am construing your email as an effort to see if you can agree to the proposal we presented by 11 a.m. today, and Cal Advocates will not file motions at this time. I can agree to give until end of business day tomorrow (Wednesday) on East Coast time (5pm EST/2pm PST) to give us your response. I want to remind you that we came out of yesterday’s meeting with an understanding that both sides would be talking internally with our clients and coming up with and sharing any or further compromises. You have had the opportunity to talk further with your team after hearing Cal Advocates’ position at our meet and confer. In good faith, Cal Advocates offered to consider what PG&E shared and proactively let you know before the end of day what, if anything, we had to share after the internal consultation. In no way does the Commission’s rules indicate that it is not engaging in good faith if after the meet and confer, the parties take a position that the other party is not amenable to. Cal Advocates has been engaging in good faith and I disagree with your characterization that our actions have been otherwise.

Anyways, thanks for communicating your concerns with me. And I look forward to getting a call/email from you!

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>  
Sent: Monday, October 25, 2021 6:44 PM  
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>  
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Motion of Public Advocates Office - Exhibit H

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Phone: (415) 703-1980
Email: carolyn.chen@cpuc.ca.gov

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Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles,

I want to soften the deadline in my previous email of getting a response by end of day tomorrow (Wednesday, 5pm EST/2pm PST). We are amenable to setting up a meeting to talk no later than this week if we cannot get in touch today, and request PG&E provide their response to Cal Advocates 24 hours from the meeting. Many thanks. You are always welcome to call me too.

-Carolyn

From: Chen, Carolyn  
Sent: Tuesday, October 26, 2021 9:40 AM  
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>  
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>  
Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles:

Thank you for responding and your efforts to get clarity. I am available to talk today. Please feel free to call me at 818-357-7451. Also, may I suggest emailing your question(s) to us, which may help clarify anything you are unclear about and so we don’t have to wait until you and I coordinate a call to hear what you need clarity about? While there is no set deadline in a proceeding we are working against, we do not want to delay this any further as it is important to the public. As we all agreed yesterday, the fact that PG&E’s actions – for whatever reason – got us to this meet and confer stage is unfortunate, given that that throughout this process PG&E has always had the ability to ask for clarity and communicate with us informally, sooner.

I am construing your email as an effort to see if you can agree to the proposal we presented by 11 a.m. today, and Cal Advocates will not file motions at this time. I can agree to give until end of business day tomorrow (Wednesday) on East Coast time (5pm EST/2pm PST) to give us your response. I want to remind you that we came out of yesterday’s meeting with an understanding that both sides would be talking internally with our clients and coming up with and sharing any or further compromises. You have had the opportunity to talk further with your team after hearing Cal Advocates’ position at our meet and confer. In good faith, Cal Advocates offered to consider what PG&E shared and proactively let you know before the end of day what, if anything, we had to share after the internal consultation. In no way does the Commission’s rules indicate that it is not engaging in good faith if after the meet and confer, the parties take a position that the other party is not amenable to. Cal Advocates has been engaging in good faith and I disagree with your characterization that our actions have been otherwise.

Anyways, thanks for communicating your concerns with me. And I look forward to getting a call/email from you!

-Carolyn
From: Middlekauff, Charles (Law) <CRMd@pge.com>  
Sent: Monday, October 25, 2021 6:44 PM  
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>  
Cc: Wehman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>  
Subject: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Carolyn:

Thank you for the response. As Spencer and I indicated today, we are both currently located on the east coast so this came in at 7:32 p.m. (EST). Spencer and I have not had a chance to talk, and we would like to discuss this issue with people internally as well. Given the time difference here, I will not be able to reach Spencer tonight (I have already tried) and we may be challenged meeting tomorrow morning given schedules. In addition, I have some questions regarding Cal Advocates’ clarifications below, especially with regard to Questions 1 and 2.

The 11:00 a.m. (PST) deadline is not reasonable nor does it appear to be in good faith. See Rule 11.3(a). While we will definitely respond promptly after we have a chance to get clarification regarding Cal Advocates’ proposal, providing PG&E less than 24 hours (especially when this e-mail was sent after hours on the east coast) does not seem reasonable.

Thus, I have two requests. First, I would like to talk further about the proposal below to understand what Cal Advocates is proposing. Second, once we receive further clarification, we would like 24 hours to make a decision. As you indicated today, there is not a proceeding pending that this information will be used for, nor to my knowledge is there a deadline that is upcoming for which Cal Advocates needs these materials (e.g., testimony, etc.). Thus, allowing us 24 hours to consider your proposal and respond, after receiving further clarification, seems entirely reasonable.

I look forward to your confirmation that you will not be filing a motion after 11:00 a.m. (PST) tomorrow and determining when you are available for a further call to clarify this request.

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>  
Sent: Monday, October 25, 2021 4:32 PM  
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>  
Cc: Wehman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>  
Subject: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Charles,

Thank you and Spencer for meeting and conferring with us today regarding PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A).
Per our meeting today, at this time, Cal Advocates is willing to limit the data request CalAdvocates-PGE-NonCase-AWM-09302021A, to the following:

1. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 3-5, for meetings you indicated PG&E would be willing to provide materials for, including
   - (a) PG&E’s May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS’s Draft Action Statement, and
   - (b) PG&E’s October 8, 2021, meeting with Commissioner Guzman Aceves’s Office regarding the Wildfire Mitigation Plan, as noticed in PG&E’s October 5, 2021 notice sent to the R.18-10-007 service list.

2. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 1 and 2. After we receive answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

*NOTE:

For purposes of this set of data requests, a “meeting” or “presentation” includes phone, video, or in-person meetings, conferences, discussions, or presentations that are substantive in nature. By “substantive,” we mean not “procedural matters” as defined in the Commission’s Rules of Practice and Procedure, such as Rule 8.1(e), and regardless of whether such meeting or presentation was within or outside a formal Commission proceeding, and before the OEIS for those questions about meetings/presentations with OEIS.

Please let me know by 11 a.m. tomorrow Tuesday, October 26, whether PG&E will agree to provide these data requests above timely. If I do not hear an answer from you then, we will proceed with motions to compel and for sanctions. Thanks for your cooperation.

Sincerely,
Carolyn Chen

From: Chen, Carolyn
Sent: Friday, October 22, 2021 12:45 PM
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan>Welcomeman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Wonderful. I’ll send the meeting request for 11:00 a.m. soon. I’ll block out an hour just in case we need it, but I don’t expect it to take the full block of time. Thank you.
-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Friday, October 22, 2021 12:02 PM
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

11:00 a.m. works great for Monday (10/25).

If you can send a meeting invite, that would be great.

Have a good weekend.

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>
Sent: Friday, October 22, 2021 9:42 AM
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Hi Charles,
Thank you so much for your quick response. 11 a.m. would work slightly better for our team, but if 10:30 a.m. is the only time you can meet, we can make it work. Can you let me know if 11 would work? If not, I'll proceed to set up a meeting for 10:30 a.m.

Many thanks,
Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Friday, October 22, 2021 6:36 AM
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Carolyn:
Thank you for touching base and Spencer and I would be happy to discuss. Monday sounds great – how about 10:30 a.m. (PST)? I need to confirm with Spencer that he can move a meeting at that time, but if he can, that would work for me.

Does that work for the Cal Advocates team?

Charles
From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>
Sent: Thursday, October 21, 2021 2:58 PM
To: Olinek, Spencer <WSO3@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Hi Spencer and Charles,

Hope all is well. Can we have a meet and confer to discuss PG&E’s responses in PG&E Non-Case Data Response CalAdvocates_077 and whether PG&E will reconsider its responses? I’m available tomorrow, Friday, 10/22, afternoon, and Monday, 10/25, late morning and afternoon. Please let me know what times during any of those windows you and/or the appropriate attendees are available.

Many thanks in advance for taking the time.

-Carolyn

Carolyn Chen (she/her)
Attorney, Legal Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA  94102-3298
Phone: (415) 703-1980
Email: carolyn.chen@cpuc.ca.gov

The information contained in this email communication, and any file(s) attached to it, may be confidential and may contain attorney/client-privileged information or work product. If the reader of this email is not the intended recipient (or the authorized agent responsible for delivering this email to the intended recipient), you have received this in error, and any review, dissemination, distribution or other use of this email is strictly prohibited. If you have received this email in error, please notify the sender by reply email and delete all copies of this email from your system. Thank you.
For questions regarding this response, please send inquiries to Spencer Olinek (spencer.olinek@pge.com).

Taylor Storer
Pacific Gas and Electric Company
Case Coordinator | Regulatory Affairs
925.989.8397 | taylor.storer@pge.com
Hi Charles,

I am writing to follow up on the status of Cal Advocates Data Request (DR) “CalAdvocates-PGE-NonCase-AWM-09302021A,” dated September 30, 2021. In our conversation on Wednesday, October 27, you indicated that you believed the Interim Director of Cal Advocates and Director of OEIS were going to be discussing the data requests, and that you believed that Cal Advocates’ DR should be put “in a holding pattern.” At this time, I have not received any indications that this meeting will impact Cal Advocates’ pending data request.

We previously met and conferred regarding this DR on Monday, October 25, 2021. At our meeting, PG&E indicated it was willing to provide partial data request responses. Cal Advocates agreed to consider what PG&E stated at the meeting and later emailed at 4:32 p.m. that Cal Advocates would accept partial responses to its data request as a starting point. (See October 25, 4:32 email memorializing Cal Advocates’ agreement.)

Therefore, I ask that you please let me know by next Tuesday, November 2, 2021, 5pm, whether PG&E will agree to provide at a minimum, the items listed in my email on October 25, at 4:32 p.m. by Monday, November 8, 2021.

Up to this point, you have not articulated legitimate objections to the data requests, nor have you provided any concrete information regarding your alleged confusion with our data requests, particularly regarding meetings with OEIS (Questions 1, and 3-5 for meetings with OEIS). Nevertheless, I have responded to all of your questions – multiple times, at our meet and confer on October 25, and in my subsequent communications with you. It is notable that in our October 27 phone conversation, I offered to clarify anything you wanted clarification on, and you declined. You also have not taken any opportunity to provide at least partial responses to Cal Advocates’ data requests that you did not express any confusion on, including Question 2 regarding communications with the Commissioners’ offices, and Questions 3-5 for meetings with the Commissioners’ offices, as well as for the May 2021 meeting with OEIS that we discussed.

I also note that in our discussions on October 25, you acknowledged and were not confused about Cal Advocates’ broad statutory authority to conduct discovery, yet continued to assert that PG&E is justified in not providing the responses to Cal Advocates’ data requests.

Even given what appears to be a lack of cooperation and stalling by PG&E, I remain hopeful that we can resolve these data requests. Therefore, please confirm by Tuesday, November 2, that PG&E will provide by Monday, November 8, 2021, the items 1(a), 1(b), and 2 listed in the Monday, October 25, 4:32 p.m. email.

Thank you.
From: Chen, Carolyn
Sent: Wednesday, October 27, 2021 12:28 PM
To: Middlekauff, Charles (Law) <CRMd@pge.com>
Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response

CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles,
Thanks so much. I called and left a voicemail. Unfortunately, I’m having delay issues with receiving voicemails so I have not been able to listen to your message yet. Hopefully soon or we’ll talk soon.

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Wednesday, October 27, 2021 12:17 PM
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response

CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Carolyn:

I left you a voice mail. Give me a call (650-766-9147) when you have a chance.

Thanks!

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>
Sent: Tuesday, October 26, 2021 10:25 AM
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>;
Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response

CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Charles,

I want to soften the deadline in my previous email of getting a response by end of day tomorrow
(Wednesday, 5pm EST/2pm PST). We are amenable to setting up a meeting to talk no later than this week if we cannot get in touch today, and request PG&E provide their response to Cal Advocates 24 hours from the meeting. Many thanks. You are always welcome to call me too.

-Carolyn

From: Chen, Carolyn  
Sent: Tuesday, October 26, 2021 9:40 AM  
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>  
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>  
Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)  

Charles:

Thank you for responding and your efforts to get clarity. I am available to talk today. Please feel free to call me at 818-357-7451. Also, may I suggest emailing your question(s) to us, which may help clarify anything you are unclear about and so we don’t have to wait until you and I coordinate a call to hear what you need clarity about? While there is no set deadline in a proceeding we are working against, we do not want to delay this any further as it is important to the public. As we all agreed yesterday, the fact that PG&E’s actions – for whatever reason – got us to this meet and confer stage is unfortunate, given that that throughout this process PG&E has always had the ability to ask for clarity and communicate with us informally, sooner.

I am construing your email as an effort to see if you can agree to the proposal we presented by 11 a.m. today, and Cal Advocates will not file motions at this time. I can agree to give until end of business day tomorrow (Wednesday) on East Coast time (5pm EST/2pm PST) to give us your response. I want to remind you that we came out of yesterday’s meeting with an understanding that both sides would be talking internally with our clients and coming up with and sharing any or further compromises. You have had the opportunity to talk further with your team after hearing Cal Advocates’ position at our meet and confer. In good faith, Cal Advocates offered to consider what PG&E shared and proactively let you know before the end of day what, if anything, we had to share after the internal consultation. In no way does the Commission’s rules indicate that it is not engaging in good faith if after the meet and confer, the parties take a position that the other party is not amenable to. Cal Advocates has been engaging in good faith and I disagree with your characterization that our actions have been otherwise.

Anyways, thanks for communicating your concerns with me. And I look forward to getting a call/email from you!

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Carolyn:

Thank you for the response. As Spencer and I indicated today, we are both currently located on the east coast so this came in at 7:32 p.m. (EST). Spencer and I have not had a chance to talk, and we would like to discuss this issue with people internally as well. Given the time difference here, I will not be able to reach Spencer tonight (I have already tried) and we may be challenged meeting tomorrow morning given schedules. In addition, I have some questions regarding Cal Advocates’ clarifications below, especially with regard to Questions 1 and 2.

The 11:00 a.m. (PST) deadline is not reasonable nor does it appear to be in good faith. See Rule 11.3(a). While we will definitely respond promptly after we have a chance to get clarification regarding Cal Advocates’ proposal, providing PG&E less than 24 hours (especially when this e-mail was sent after hours on the east coast) does not seem reasonable.

Thus, I have two requests. First, I would like to talk further about the proposal below to understand what Cal Advocates is proposing. Second, once we receive further clarification, we would like 24 hours to make a decision. As you indicated today, there is not a proceeding pending that this information will be used for, nor to my knowledge is there a deadline that is upcoming for which Cal Advocates needs these materials (e.g., testimony, etc.). Thus, allowing us 24 hours to consider your proposal and respond, after receiving further clarification, seems entirely reasonable.

I look forward to your confirmation that you will not be filing a motion after 11:00 a.m. (PST) tomorrow and determining when you are available for a further call to clarify this request.

Charles
Charles,

Thank you and Spencer for meeting and conferring with us today regarding PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A).

Per our meeting today, at this time, Cal Advocates is willing to limit the data request CalAdvocates-PGE-NonCase-AWM-09302021A, to the following:

1. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 3-5, for meetings you indicated PG&E would be willing to provide materials for, including
   - (a) PG&E’s May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS’s Draft Action Statement, and
   - (b) PG&E’s October 8, 2021, meeting with Commissioner Guzman Aceves’s Office regarding the Wildfire Mitigation Plan, as noticed in PG&E’s October 5, 2021 notice sent to the R.18-10-007 service list.

2. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 1 and 2. After we receive answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

*NOTE:

For purposes of this set of data requests, a “meeting” or “presentation” includes phone, video, or in-person meetings, conferences, discussions, or presentations that are substantive in nature. By “substantive,” we mean not “procedural matters” as defined in the Commission’s Rules of Practice and Procedure, such as Rule 8.1(e), and regardless of whether such meeting or presentation was within or outside a formal Commission proceeding, and before the OEIS for those questions about meetings/presentations with OEIS.

Please let me know by 11 a.m. tomorrow Tuesday, October 26, whether PG&E will agree to provide these data requests above timely. If I do not hear an answer from you then, we will proceed with motions to compel and for sanctions. Thanks for your cooperation.

Sincerely,
Carolyn Chen

From: Chen, Carolyn
Sent: Friday, October 22, 2021 12:45 PM
To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <TBSF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Wonderful. I’ll send the meeting request for 11:00 a.m. soon. I’ll block out an hour just in case we need it, but I don’t expect it to take the full block of time. Thank you.

-Carolyn

11:00 a.m. works great for Monday (10/25).

If you can send a meeting invite, that would be great.

Have a good weekend.

Hi Charles,
Thank you so much for your quick response. 11 a.m. would work slightly better for our team, but if 10:30 a.m. is the only time you can meet, we can make it work. Can you let me know if 11 would work? If not, I’ll proceed to set up a meeting for 10:30 a.m.

Many thanks,
Carolyn
Carolyn:

Thank you for touching base and Spencer and I would be happy to discuss. Monday sounds great – how about 10:30 a.m. (PST)? I need to confirm with Spencer that he can move a meeting at that time, but if he can, that would work for me.

Does that work for the Cal Advocates team?

Charles

Hope all is well. Can we have a meet and confer to discuss PG&E’s responses in PG&E Non-Case Data Response CalAdvocates_077 and whether PG&E will reconsider its responses? I’m available tomorrow, Friday, 10/22, afternoon, and Monday, 10/25, late morning and afternoon. Please let me know what times during any of those windows you and/or the appropriate attendees are available.

Many thanks in advance for taking the time.

-Carolyn

Carolyn Chen (she/her)
Attorney, Legal Division
California Public Utilities Commission
All,

Please see attached PG&E’s responses to Cal Advocates data request “CalAdvocates-PGE-NonCase-AWM-09302021A”; PG&E Non-Case Discovery, CalAdvocates_077, dated October 14, 2021.

For questions regarding this response, please send inquiries to Spencer Olinek (spencer.olinek@pge.com).

Taylor Storer
Pacific Gas and Electric Company
Case Coordinator | Regulatory Affairs
925.989.8397 | taylor.storer@pge.com
Carolyn:

This e-mail responds to Cal Advocates’ proposal regarding PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A), which includes five questions. Below we are providing Cal Advocates’ proposal for each of the five questions and our response (in red for ease of reference):

1. **Question 1 – Cal Advocates proposes that PG&E provide a response by November 8, 2021.**

   **PG&E Response:** This question requests a list of all meetings and presentations made by PG&E to the Office of Energy Infrastructure Safety (Energy Safety) since July 1, 2021 related to “Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.” PG&E objected to this request on the basis of relevance and burden. Based on our conversations, we do not believe that Cal Advocates has adequately explained the relevance of this request to Cal Advocates’ statutory mission. In addition, this request seeks information concerning meetings and presentations with a separate California state agency. We do not believe this type of request is appropriate for discovery propounded on PG&E. Instead, if Cal Advocates wants this information, it should request it from Energy Safety or confirm that Energy Safety has indicated it does not oppose PG&E providing this information.

2. **Question 2 – Cal Advocates proposes that PG&E provide a response by November 8, 2021.**

   **PG&E Response:** This question requests a list of all meetings and presentations made by PG&E to Commissioners or Commissioner Advisors since July 1, 2021 related to “Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.” PG&E will provide this information but given resource constraints will not be able to do so until Friday (11/12).

3. **Questions 3-5 – Cal Advocates proposes that PG&E provide by November 8, 2021:**

   (a) **PG&E’s May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS’s Draft Action Statement, and**

   (b) **PG&E’s October 8, 2021, meeting with Commissioner Guzman Aceves’s Office regarding the Wildfire Mitigation Plan, as noticed in PG&E’s October 5, 2021 notice sent to the R.18-10-007 service list.**
PG&E Response: We will provide Item (b) by Friday (11/5), which is earlier than Cal Advocates’ request that these documents be provided on Monday (11/8). As to Item (a), we will not be providing this material for the reasons explained above in response to Question 1.

4. Questions 3-5 – Cal Advocates proposes that after it receives answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

PG&E Response: As indicated above, PG&E will not be providing a response to Question 1. For Question 2, we will wait to see if there are any additional documents requested by Cal Advocates. PG&E reserves the right to object to any additional requests on the grounds of relevance or burden.

Thank you for your consideration in this matter.

Charles
PACIFIC GAS AND ELECTRIC COMPANY
Non-Case Discovery
Data Response

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<thead>
<tr>
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<th>CalAdvocates_077-Q03</th>
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<tr>
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<tr>
<td>Request Date:</td>
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<td>Requester DR No.:</td>
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<td>Date Sent:</td>
<td>October 14, 2021</td>
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<td>Rev01: November 5, 2021</td>
<td></td>
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<tr>
<td>Requesting Party:</td>
<td>Public Advocates Office</td>
</tr>
<tr>
<td>PG&amp;E Witness:</td>
<td>Alan Wehrman</td>
</tr>
</tbody>
</table>

**QUESTION 03**

For all meetings and presentations listed in response to Question 1 and Question 2, please provide relevant materials. This may include, but is not limited to:

- Meeting agendas
- Meeting minutes
- Meeting transcripts
- Copies of presentations
- Copies of documents presented or discussed

If any requested material was already provided in a filed notice of *ex parte* communications, you may refer to such document.

**ANSWER 03 REVISED 01**

Subject to and without waiving the objections stated in the responses to Questions 1 and 2, as a part of the meet and confer process, PG&E is providing the following document to Cal Advocates: materials provided in PG&E’s October 8, 2021, meeting with Commissioner Guzman Aceves’s Office regarding the Wildfire Mitigation Plan, as noticed in PG&E’s October 5, 2021 notice sent to the R.18-10-007 service list. This document is being provided as [Non-CaseDiscovery_DR_CalAdvocates_077-Q03Rev01Atch01]
2021 Wildfire Mitigation Plan Approval
Safety Orientation

Earthquake
Know the safest places to duck, cover, and hold, such as under sturdy desks and tables.

Fire
Know your exits, escape routes, and evacuation plan. If safe to do so, use your compliant fire extinguisher. Exit the house and call 911.

Active Shooter
Get out, hide out, take out, and call 911.

Medical Emergency
Know who can perform first aid and CPR. Call 911 if you’re alone or share your location with the call leader to send help. If you have an AED, ensure you and others in your household know where it’s located and how to use it.

Psychological Safety
✓ We care for each other.
✓ Look out for one another.
✓ Create a safe space for all.
✓ Welcome new ideas from everyone.
✓ Practice self-care.

Ergonomics
✓ Practice 30/30 (every 30 minutes, move & stretch for 30 seconds).
✓ Ensure proper ergonomics.
✓ Use and update RSI Guard.

Emergency Planning
✓ Update emergency contacts via PG&E@Work for Me.
✓ Create/update a personal emergency preparedness plan.

COVID-19
✓ Wash hands frequently
✓ Wear a mask when required
✓ Get vaccinated, if you can
✓ Follow current CAL-OSHA regulations and local county health orders.
✓ Visit COVID-19 employee site for latest updates and tips.

Corporate Security 800-691-0410 | Nurse Care Line 888-449-7787 | HR Helpline 415-973-4357 | Employee Assistance Program 888-445-4436
1. **Status of PG&E’s 2021 WMP approval**
   - On September 22nd, 2021, the Office of Energy Infrastructure Safety (“OEIS” and “Energy Safety”) released their *Final Action Statement on the 2021 Wildfire Mitigation Plan (WMP) Update of Pacific Gas & Electric Company (“PG&E”) approving PG&E’s WMP*
   - Remaining issues in the Revision notice were determined by Energy Safety to be sufficiently resolved to allow for approval of PG&E’s 2021 WMP

2. **Update on 5 key issues discussed during 9/24 Commission Meeting**
   - 4 of these issues originated from the Revision Notice
     - PSPS Quantitative Targets
     - Risk Modelling
     - Risk-Spend Efficiency (“RSE”)
     - Vegetation Management (“VM”) Expenditure Data
   - 1 item originated from PG&E’s July 2021 Announcement
     - 10K Undergrounding Initiative

3. **Address any additional questions and next steps**
OEIS Finding on Revision Notice Response:
“PG&E’s response sufficiently addresses each required remedy; however, PG&E states that its PSPS approach will likely change in August 2021… As soon as practicable, PG&E must provide an update, including showing how its new PSPS protocols affect targets.”

PG&E’s Response:
- PG&E provided an update to Energy Safety and the Commission on September 30th, 2021 which included:
  - A description of the 2021 PSPS Process and Revised Protocols
  - Analysis of the impacts to PSPS Event scope, duration, and frequency from the revised Protocols
  - Supporting documentation and white papers supporting the reduction of PSPS Event scope, duration, and customer impact

- When compared to the 2020 PSPS Protocols, the revised protocols show a decrease in average event duration and customer counts:

<table>
<thead>
<tr>
<th></th>
<th>Frequency</th>
<th>Average Event Duration</th>
<th>Average Event Customer Count</th>
<th>Largest Event Customer Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020 PSPS Protocols</td>
<td>4.5 events per year</td>
<td>39.6 Hours</td>
<td>160 thousand customers</td>
<td>553 thousand customers</td>
</tr>
<tr>
<td>2021 PSPS Protocols</td>
<td>4.75 events per year</td>
<td>37.1 Hours</td>
<td>105 thousand customers</td>
<td>530 thousand customers</td>
</tr>
<tr>
<td>YoY Improvement</td>
<td>+6%</td>
<td>-6%</td>
<td>-34%</td>
<td>-4%</td>
</tr>
</tbody>
</table>
OEIS Finding on Revision Notice Response:
“PG&E provided the required information. However, additional remedies are required... PG&E must provide updates on its progress [implementing third-party evaluation findings].”

PG&E’s Response:
- PG&E retained Energy and Environmental Economics, Inc. (“E3”) to perform an independent evaluation of the 2021 Wildfire Distribution Risk Model (“WDRM”). E3 concluded that PG&E’s risk model was “appropriately designed for its stated goals” and recommended areas for further improvement.
- In PG&E’s Revision Notice Response on June 3rd, 2021, we provided E3’s recommendations and our plan to incorporate each of the recommendations into the next iteration of the risk model in 2022.
- Most recently, Energy Safety has initiated a required Remedy for the utilities to participate in a risk modelling working group to develop a more consistent statewide approach to wildfire risk modelling:
  - The Working Group includes the utility stakeholders identified by OEIS (PG&E, SDG&E, SCE, PacifiCorp, Bear Valley Electric Service, inc. and Liberty Utilities) as well as additional stakeholders including interveners and academic experts
  - The kickoff session for this working group was conducted October 5th & 6th, 2021
  - Bi-weekly sessions begin the week of October 18th, 2021
OEIS Finding on Revision Notice Response:
“PG&E addressed the critical issue by providing the costs, miles treated, and RSE estimates for covered conductor installation, undergrounding, and remote grid.”

PG&E’s Response:
- In PG&E’s Revision Notice Response on June 3rd, 2021, we provided the detailed costs, miles treated, RSE estimates, and other relevant information and data for covered conductor installation, undergrounding, and remote grid (PG&E’s revised Table 12.)

- Most recently, Energy Safety has initiated a required Remedy for each Utility to participate in a risk modelling working group: PG&E fully supports collaborating “through a working group [with the California IOUs], facilitated by Energy Safety to develop a more standardized approach to the inputs and assumptions used for RSE calculations.”

- PG&E’s efforts to increase RSE calculations over the past two years has been acknowledged by Energy Safety in the Final Action Statement:
  - “PG&E provided 10 times more risk-spend efficiency (RSE) estimates for mitigation initiatives than it did in its 2020 WMP”
  - “PG&E developed (RSE) Risk Spend Efficiency Values for 12 of its 18 initiatives in Situational Awareness & Forecasting, much more than their peer utilities.”

<table>
<thead>
<tr>
<th>WMP</th>
<th>RSEs</th>
<th>Total Initiatives</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>4</td>
<td>119</td>
<td>3.3%</td>
</tr>
<tr>
<td>2021</td>
<td>55</td>
<td>124</td>
<td>44.3%</td>
</tr>
<tr>
<td>YoY Increase:</td>
<td>+51</td>
<td>+5</td>
<td>+41.0%</td>
</tr>
</tbody>
</table>
OEIS Finding on Revision Notice Response:
“PG&E provided the required information, including a revised Table 12. However, Energy Safety remains concerned about the inconsistency of data and supports PG&E’s proposal to hire a ‘business liaison’ for each major WMP initiative category.”

PG&E’s Response:
- Reporting criteria in each WMP has evolved over the years to provide Energy Safety improved clarity and transparency to Wildfire Mitigation Program spend. Drivers of inconsistency discussed in our Revision Notice included descriptions relative to:
  - Total population of initiatives (i.e., some were removed / added in 2021 vs. 2020) or evolving / changing scope of the initiatives
  - Assumptions made to enable reporting of initiative spend
  - Requirements for reporting territory wide information was not originally required for the 2020 WMP
- In PG&E’s Revision Notice Response on June 3rd, 2021, we proposed a business liaison to support consistency across financial information, units, and RSEs. Energy Safety supports this proposal.
- Additional future improvements include:
  - Use point forecasting techniques rather than relying on historical numbers.
  - Closer coordination and control check-points between all teams.
OEIS Finding on Revision Notice Response:
Energy Safety noted their support of PG&E’s ambition “to aggressively reduce its wildfire risk” through the 10k undergrounding program but noted that “PG&E must provide additional detail on its short-term and long-term plans for grid hardening, as well as an update on its progress.”

PG&E’s Response:

- PG&E has utilized a risk-informed System Hardening Decision Tree to standardize mitigation selection and optimize wildfire risk reduction. The 10k undergrounding program is an expansion of this methodology and will leverage additional inputs, including factors considered in the Decision Tree, when identifying spans and executing undergrounding work.

  “The new decision-making framework provides a consistent approach for evaluating the optimal mitigation measure for each circuit segment that PG&E selects for mitigation, with a focus on reducing catastrophic wildfire risk. The new decision-making framework provides a more comprehensive and targeted approach than PG&E presented in its 2020 WMP and represents a significant improvement to PG&E’s initiative selection process.”

  - OEIS Final Action Statement, September 22nd, 2021

- PG&E is preparing to submit additional information in the 10K undergrounding program with the 2022 Wildfire Mitigation Plan. The approval of the WMP Update does not include approval of the revised undergrounding plan.

  “However, it should be noted that approval of this WMP Update does not include approval of PG&E’s new undergrounding plan. PG&E’s new undergrounding plan is still in development and was not included in PG&E’s submittal for its 2021 WMP Update.”

  - OEIS Final Action Statement, September 22nd, 2021

- Activities currently underway will manage risks around our accelerated rate of undergrounding, include researching innovative processes & technology to improve UG performance, benchmarking with peer utilities, local government / agency coordination, and customer / community feedback sessions.
APPENDIX
Enhanced Powerline Safety Settings ("EPSS")

To help prevent wildfires during this hot and dry season, we have adjusted the settings on some of our equipment to automatically turn off power more quickly if the system detects a problem.

1. When an object strikes the line or a fault occurs...

2. Sensors detect the change in current and shut off power within one-tenth of a second.

3. We check the lines for damage before safely restoring power. This process can take several hours, depending on terrain.

Patrols are done by helicopter, truck or on foot during daylight hours.
EPSS and our Wildfire Mitigation Plan programs have resulted in a ~55% decrease as compared to 2020 CPUC Reportable Ignitions in HFTDs that could lead to a potential catastrophic wildfire.

Data as of 10/2/2021
On EPSS enabled circuits, the CPUC Reportable Ignition-to-outage ratio is down nearly 80% across the same time period last year.

For EPSS-Enabled Circuits only...

<table>
<thead>
<tr>
<th>PERIOD</th>
<th>CPUC REPORTABLE IGNITIONS (7/28 – 9/18)</th>
<th>OUTAGES (7/28 – 9/18)</th>
<th>IGNITION % OF OUTAGES</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>1</td>
<td>302</td>
<td>0.3%</td>
</tr>
<tr>
<td>2020</td>
<td>18</td>
<td>1,291</td>
<td>1.4%</td>
</tr>
<tr>
<td>3-YEAR AVERAGE (2020-2018)</td>
<td>17</td>
<td>763</td>
<td>2.2%</td>
</tr>
</tbody>
</table>

79% REDUCTION VS. 2020

86% REDUCTION VS. 3 YR. EPSS CIRCUIT AVERAGE

92% REDUCTION VS. SYSTEM-WIDE AVERAGE

MAY – NOV. SYSTEM-WIDE IGNITION % OF OUTAGES1: 3.6%

1 CPUC reportable ignitions to outages observed from 2015-2020 between May-November excluding weather days that included rain, winter storm, low snow, lightning, for each of those cause classes
We have an unwavering focus to mitigate reliability impacts while maintaining the risk reduction from instances where a hazard was found from an EPSS outage that potentially prevented a wildfire.

**Example 1: Oakhurst Veg Contact & Wires Down**

On September 7th, ~1,000 customers in the Oakhurst area lost power when a device in EPSS tripped on the Coarsegold 2104 circuit and deenergized the line.

During the restoration patrol, a PG&E qualified technician arrived on site to find what appeared to be a green healthy oak tree that had broken and fallen on the line, taking down two poles and the conductor with it. The tree failure occurred in an area of dense dry fuels along a narrow road – an area with high potential for fire spread that could be challenging to suppress quickly.
Adjusting circuit devices to EPSS makes the system safer and helps to reduce potential wildfires, however it has also resulted in more frequent and longer outages for customers.

On EPSS Circuits between 7/28 to 9/18:

<table>
<thead>
<tr>
<th>Metric</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPSS outages</td>
<td>302</td>
</tr>
<tr>
<td>Impacted Customers</td>
<td>380,317</td>
</tr>
<tr>
<td>Customer Average Interruption Duration Index (CAIDI)</td>
<td>495</td>
</tr>
<tr>
<td>Counties experiencing an EPSS – related outage</td>
<td>34</td>
</tr>
</tbody>
</table>

We understand what these impacts mean to our customers & communities:

- **Increase in outage frequency**: increase in outage for certain circuits in specific geographic locations
- **More Customers with power interruptions**: ~120% increase in Total Customers Out
- **More customers out of power for longer**: ~500% increase in Customer Outage Minutes
- **Longer outage Durations**: ~107% increase in CAIDI (Customer Average Interruption Duration Index)

Approximate percentage increases based on preliminary EPSS circuit performance outage data through 9/18/21 vs. 3-year historical data
Efforts to Reduce EPSS Customer Impacts

**Improvements In Place**
- Fine tuning sensitivity on our equipment to reduce likelihood of an outage
- Increasing communication between our devices to reduce the size of outages
- Improved internal coordination of patrol crews for faster restoration times
- Amended patrol guidance for EPSS-enabled circuits

**Improvements Underway**
- Installation of additional animal protection on our equipment
- Targeted vegetation clearing to prevent branch and tree fall-ins
- Targeted asset hardening and inspections

**Planned Improvements**
- Dedicated crews for restoration and readiness response
- More accurate restoration times during outages
Expanded Customer Communications

- **Email notice and/or postcard** sent to all customers who may be impacted
- **Sprinter mobile command vehicle** on site of outages in Santa Cruz locations
- **Social media postings** targeted to highly impacted communities
- **Letters to customers** on high impacted circuits
- **Engagement** with local elected officials, hospitals, schools, water agencies, and telecommunication customers
- **We are committed** to responding to every customer question and feedback. Customers can email us at wildfiresafety@pge.com
- **Automated calls** supporting enhanced reliability patrols and Enhanced Powerline Safety Setting outages
Is there Egress / Ingress concerns expressed by PSS team?

Area of impact identified, relocate to UG preferred and pursue relevant path

Can the concern be safely mitigated utilizing intumescent wrapped or composite poles?

Area of impact identified, relocate to underground preferred

No area of impact identified, OH in place preferred

Are there areas identified with tree strike potential within the circuit segment?

Low (0-5) Moderate (6-14) High (15+)

No area of impact identified, OH in place preferred

Continued on next slide
System Hardening Decision Tree (Part 2 of 2)

Continued from last slide

Review areas of impact for additional land/bio/cultural/constructability

Identify target locations, UG preferred

Compute execution risks, costs and risk reduction and identify the highest RSE

Recommend OH/Hybrid alternative and present alternative cost for decision

Present alternatives, RSE, Execution Timelines, PSS, PSPS, and Tree Strike flags for Wildfire Governance Committee approval

Are there any significant dependency or constructability limitations in the areas of impact? (Threshold: 2+ year incremental delay)

If alternatives fall within a 25% range, is there additional benefit to choosing an alternative that is not the top ranked RSE?

Does the CPZ meet ECOP threshold (>25% structures warrant replacement) and result in a more timely mitigation method preferred (e.g., OH)?

Identify target locations, underground preferred

Proceed with recommendation, relocate to UG areas of impact or concern

Proceed with recommendation, update materials in EDRS to reflect approved mitigation method and proceed to execution

Take actions and develop new alternatives based on the feedback and re-submit to the Wildfire Governance Committee for approval

Key

Decision

Step

1. Review areas of impact for additional land/bio/cultural/constructability
2. Identify target locations, UG preferred
3. Compute execution risks, costs and risk reduction and identify the highest RSE
4. Recommend OH/Hybrid alternative and present alternative cost for decision
5. Present alternatives, RSE, Execution Timelines, PSS, PSPS, and Tree Strike flags for Wildfire Governance Committee approval
6. Are there any significant dependency or constructability limitations in the areas of impact? (Threshold: 2+ year incremental delay)
7. If alternatives fall within a 25% range, is there additional benefit to choosing an alternative that is not the top ranked RSE?
8. Does the CPZ meet ECOP threshold (>25% structures warrant replacement) and result in a more timely mitigation method preferred (e.g., OH)?
9. Identify target locations, underground preferred
10. Proceed with recommendation, relocate to UG areas of impact or concern
11. Proceed with recommendation, update materials in EDRS to reflect approved mitigation method and proceed to execution
12. Take actions and develop new alternatives based on the feedback and re-submit to the Wildfire Governance Committee for approval

Decision Steps

- FSD
- EASOP
- WGC

Key Steps

- Decision
- Step
Distribution 2021 PSPS Protocols

1. **Minimum Fire Potential Conditions**
   - The minimum fire conditions are the minimum criteria considered for a PSPS event. The following criteria are reviewed in the PG&E HFRA:
     - Sustained wind speeds above 19 mph
     - Dead Fuel Moisture 10hr less than 9%
     - Dead Fuel Moisture 100, 1000 less than 11%
     - Relative humidity below 30%
     - Herbaceous Live Fuel Moisture below 65%
     - Shrub (Chamise) Live Fuel Moisture below 90%
     - Fire Potential Index (FPI) above 0.7
   - Note: High risk warnings from Federal Agencies (ex. Red Flag Warnings) are also considered.

2. **Catastrophic Fire Probability**
   - FPI is combined with the Ignition Probability Weather (IPW) to generate the Catastrophic Fire Probability (CFP) rating.
   - CFP = FPI/IPW

   **Catastrophic Fire Behavior**
   - Even if probability of failure is unlikely, we may still turn off power where catastrophic fires are possible. We evaluate fire behavior criteria across 8 hour forecast fire simulations using Technosytes technology:
   - **Flame Length** above 8 ft
   - **Rate of Spread** above 20 ft/hr
   - **Area burned** above 100 acres

3. **Vegetation and Electric Asset Criteria Considerations**
   - We review locations where high priority trees or high priority electric compliance tags are that may increase risk of ignition. If these can not be mitigated before the event, these areas are deenergized for public safety.

4. **Event Criteria**
   - Criteria met for more than 26 grid cells (2x2km), 0.25% of PG&E’s High Fire Risk Area (HFRA).

**Definition of Catastrophic:**
- Oxford - involving or causing sudden great damage or suffering.
- Working definition of catastrophic fire – A fire that is not easily controlled, has a rapid rate of spread and threatens lives and property.
Transmission 2021 PSPS Protocols

PSPS is considered if the minimum fire conditions are met

Minimum Fire Potential Conditions
The minimum fire conditions are the minimum criteria for a PSPS event. The following criteria are reviewed in the PG&E HFRA:

- Sustained wind speeds above 19 mph
- Dead Fuel Moisture 10hr less than 9%
- Dead Fuel Moisture 100, 1000 less than 11%
- Relative humidity below 30%
- Herbaceous Live Fuel Moisture below 65%
- Shrub (Chamise) Live Fuel Moisture below 90%
- Fire Potential Index (FPI) above 0.7

Note: High risk warnings from Federal Agencies (ex. Red Flag Warnings) are also considered.

Fire Potential Index (FPI)
The likelihood of an ignition causing a large or catastrophic wildfire, assessing:

- Weather (wind speed, turbulence, temperature, vapor pressure deficit)
- Dead and Live Fuel Moisture
- Topography (terrain, slope, alignment)
- Fuel Type (grass, shrubs, forests, etc.)

Catastrophic Fire Probability – Asset
FPI is combined with the Operability Assessment (OA) to generate the Catastrophic Fire Probability Asset (CFP Asset)

\[\text{CFP}_{\text{Asset}} > 10 \ (0.01 \ unscaled)\]

Catastrophic Fire Probability – Veg.
FPI is combined with the Vegetation Assessment to form Catastrophic Fire Probability Vegetation (CFP Veg)

\[\text{CFP}_{\text{Veg.}} > 200\]

Catastrophic Fire Behavior
We evaluate fire behavior criteria across 8 hour forecast fire simulations using Technosylva technology for fire behavior that could result in a catastrophic fire.

- Flame Length > 8 ft
- Rate of Spread > 20 ch/hr
- Area burned >= 100 acres

Many of PG&E’s high voltage transmission lines exhibit very high reliability, which is reflected in the Operability Assessment model. Transmission lines are only de-energized for Catastrophic Fire Behavior where Operability Assessment fragility is also above 10 (0.01 unscaled). A single tower ‘weak link’ can bring a line into PSPS scope.

Vegetation and Electric Asset Criteria Considerations
We review locations where high priority trees or high priority electric compliance tags are that may increase risk of ignition. If these can not be mitigated before the event, these areas are deenergized for public safety.

Event Criteria
Criteria met for more than 25 grid cells (2x2km), 0.25% of PG&E’s High Fire Risk Area (HFRA)

Definition of Catastrophic:
- Oxford - involving or causing sudden great damage or suffering.
- Working definition of catastrophic fire – A fire that is not easily controlled, has a rapid rate of spread and threatens lives and property
QUESTION 02

Please provide the dates of all meetings and presentations held since July 1, 2021 between PG&E and any Commissioners of the CPUC or staff of the Commissioners of the CPUC, related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance. If this information is already provided in a filed notice of ex parte communications, you may refer to such document.

ANSWER 02 REVISED 01

Subject to and without waiving the objections stated in the response to Questions 1 and 2, as a part of the meet and confer process, PG&E provides the following information on all meetings requested of Commissioner offices by PG&E related to wildfire safety or wildfire mitigation efforts since July 1, 2021:

<table>
<thead>
<tr>
<th>Date</th>
<th>Subject</th>
<th>Commissioner Office</th>
<th>Organizations in Attendance</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/8/21</td>
<td>2021 WMP</td>
<td>Cmr. Guzman Aceves advisors</td>
<td>PG&amp;E</td>
</tr>
<tr>
<td>10/12/21</td>
<td>2021 WMP</td>
<td>Cmr. Shiroma advisors</td>
<td>PG&amp;E</td>
</tr>
<tr>
<td>10/20/21</td>
<td>2021 WMP and undergrounding</td>
<td>Cmr. Houck and advisors</td>
<td>PG&amp;E</td>
</tr>
</tbody>
</table>
PUBLIC ADVOCATES OFFICE DATA REQUEST

Proceeding: Non-Case Discovery

No. CalAdvocates-PGE-NonCase-MK3-11192021

Date: November 19, 2021
Response requested: November 24, 2021

To: Spencer Olinek
   Pacific Gas and Electric Company
   Email: Spencer.Olinek@pge.com

   Alyssa Koo
   Pacific Gas and Electric Company
   Email: Alysa.Koo@pge.com

   Charles Middlekauff
   Pacific Gas and Electric Company
   Email: Charles.Middlekauff@pge.com

   Regulatory Relations
   Pacific Gas and Electric Company
   Email: RegRelCPUCCases@pge.com

From: Matthew Karle
   Regulatory Analyst
   Public Advocates Office
   Phone: (415) 703-1850
   Email: Matthew.Karle@cpuc.ca.gov

   Carolyn Chen
   Attorney
   Public Advocates Office
   Phone: (415) 703-1980
   Email: Carolyn.Chen@cpuc.ca.gov
INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each Data Request prior to providing the response. Identify the person providing the answer to each Data Request and their contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Matthew.Karle@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, at least 3 days before the response to the Data Requests is due and provide your best estimate of when the information can be provided. Please identify the person who will be providing the response and their phone number and email address.

Responses should be provided in the original electronic format, if available, and if not available, in hard copy. (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 these Data Requests should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the Data Requests should be Bates-numbered and, if voluminous, indexed. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office at least 3 days before the response to the Data Requests is due. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

A. As used herein, the terms “you,” “your(s),” “Company,” and “PG&E” mean Pacific Gas and Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.

B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.

C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st
of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.

E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these Data Requests.

G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.

H. “Identify”:
   i. When used in reference to a person, includes stating their full name, most recent known business address and telephone number, and present title or position;
   ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.

J. “CPUC” means California Public Utilities Commission.

K. “Cal Advocates” means the Public Advocates Office.

L. “HFTD” means High Fire Threat District.

M. “WMP” means Wildfire Mitigation Plan.

DATA REQUESTS

Question 1

On November 12, 2021 PG&E provided a revised response to Public Advocates Office Data Request, “Cal Advocates Dr NonCase-AWM-09302021A,” Question 2, dated September 30, 2021.\(^1\) In PG&E’s revised DR response ("Answer 02 Revised 01"), PG&E reported an October 12 meeting with Commissioner Shiroma’s Office.

Please provide all relevant materials to this meeting in PG&E’s possession. This may include, but is not limited to:

- Meeting agendas
- Meeting minutes
- Meeting transcripts
- Copies of presentations to Commissioner Shiroma’s Office
- Copies of documents presented to or discussed with Commissioner Shiroma’s Office

\(^1\) Cal Advocates Dr NonCase-AWM-09302021A, Question 2 states:

Please provide the dates of all meetings and presentations held since July 1, 2021 between PG&E and any Commissioners of the CPUC or staff of the Commissioners of the CPUC, related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance. If this information is already provided in a filed notice of *ex parte* communications, you may refer to such document.

If any requested material was already provided in a filed notice of *ex parte* communications, you may refer to such document.

**Question 2**

Please provide copies of any oral or written data requests, information requests, or discovery requests and PG&E’s responses, if any, resulting from the October 12 meeting with Commissioner Shiroma’s office described in Question 1 above.

**Question 3**

On November 12, 2021 PG&E provided a revised response to Public Advocates Office Data Request, “Cal Advocates Dr NonCase-AWM-09302021A,” Question 2, dated September 30, 2021.³ In PG&E’s revised DR response (“Answer 02 Revised 01”),⁴ PG&E reported an October 20 meeting with Commissioner Houck’s office.

Please provide all relevant materials to this meeting in PG&E’s possession. This may include, but is not limited to:

a) Meeting agendas
b) Meeting minutes
c) Meeting transcripts
d) Copies of presentations to Commissioner Houck’s Office
e) Copies of documents presented to or discussed with to Commissioner Houck’s Office

If any requested material was already provided in a filed notice of *ex parte* communications, you may refer to such document.

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³ Cal Advocates Dr NonCase-AWM-09302021A, Question 2 states:

Please provide the dates of all meetings and presentations held since July 1, 2021 between PG&E and any Commissioners of the CPUC or staff of the Commissioners of the CPUC, related to wildfire safety or wildfire mitigation efforts.

For the purposes of this question, “wildfire safety or wildfire mitigation efforts” includes, but is not limited to, Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E’s implementation of or changes to initiatives described in its Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shutoffs.

For each meeting, please list the date, a brief description of the subject matter discussed, and the organizations or corporations in attendance. If this information is already provided in a filed notice of *ex parte* communications, you may refer to such document.

Question 4

Please provide copies of any oral or written data requests, information requests, or discovery requests and PG&E’s responses, if any, resulting from the October 20 meeting with Commissioner Houck’s office described in Question 3 above.

END OF REQUEST