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**BEFORE THE PUBLIC UTILITIES COMMISSION**
**OF THE STATE OF CALIFORNIA**

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| Application of Pacific Gas and Electric Company for Approval of its Mobile Application and Supporting Systems Pilot.<br><br>(U 39 E) | Application 19-07-___ |

# PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) MOBILE APPLICATION AND SUPPORTING SYSTEMS PILOT APPLICATION

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Dated: July 29, 2019

## TABLE OF CONTENTS

**Page**

**TABLE OF CONTENTS**
(continued)

**Page**

**BEFORE THE PUBLIC UTILITIES COMMISSION**
**OF THE STATE OF CALIFORNIA**

| | |
|---|---|
| Application of Pacific Gas and Electric Company for Approval of its Mobile Application and Supporting Systems Pilot.<br><br>(U 39 E) | Application 19-07-___ |

# PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) MOBILE APPLICATION AND SUPPORTING SYSTEMS PILOT APPLICATION

## I. INTRODUCTION

By this Application and pursuant to the Rules of Practice and Procedure (the "Rules") of the California Public Utilities Commission (the "Commission") and as a requirement of the Order Instituting Investigation and Order to Show Cause filed on June 27, 2019 (the "OII" or "I.19-06-015") to "file an application within 30 days after the issuance of this Order to develop an open source, publicly available asset management/database and mobile app,"[1] Pacific Gas and Electric Company (U 39 E) ("PG&E") hereby requests that the Commission approve PG&E's proposed mobile application and supporting systems[2] pilot described below.

## II. SUMMARY OF APPLICATION

On June 27, 2019, the Commission issued I.19-06-015 relating to the maintenance and operation of PG&E's electric facilities that "were involved in igniting fires in its service territory in 2017."[3] As part of that OII, the Commission directed PG&E to take certain immediate

[1] I.19-06-015, Ordering Paragraph 13.

[2] I.19-06-015 uses the phrase "asset management/database." In this Application, PG&E uses the phrase "support systems" to refer to all interrelated technologies and processes, including any database or databases, necessary to enable the required functionality of the mobile application.

[3] I.19-06-015 at p. 1.

corrective actions, including filing this Application for the development of a mobile application and support systems. The mobile application would "allow[] a Geographic Information System-equipped phone to send pictures of utility infrastructure."[4] The OII further details that PG&E would develop appropriate supporting systems to capture user submittals, make those submittals publicly available with the information specified in the OII, and provide the required response within 30 days of the submittals.

PG&E recognizes that such a mobile application is an innovative approach to mitigating the risk of catastrophic wildfire and looks forward to working with the Commission and other stakeholders. Specifically, PG&E appreciates that the Commission's order to develop a mobile application is intended to harness the power of the public, which may help supplement PG&E resources in monitoring its facilities. PG&E is aware that numerous successful reporting applications exist. The Waze Mobile[5] app, for example, allows users to report traffic conditions, and many public entities (e.g., BART and the City of San Francisco) allow the public to report issues. However, these applications capture issues that require no special expertise, knowledge, or training to identify. A user does not need to be a traffic engineer to report an accident, roadway congestion, or an unfilled pothole, nor does one need to be a public health expert to report dirty bathrooms and unsanitary conditions. In contrast, assessing utility infrastructure through a mobile application aimed at general public use with the goal of mitigating catastrophic wildfire is unique,

[4] *Id*. at p. 18. PG&E would like to clarify the difference between GIS (Geographic Information System), what the Commission has requested, and GPS (Global Positioning System), which would provide the "coordinates" that the Commission has mandated. GPS is the technology that pinpoints locations on the globe. When determining the coordinates of a particular location, or, here, a PG&E asset, GPS technology is used and is normally expressed as the combination of latitude and longitude. GIS, on the other hand, is a software program that captures, analyzes, interprets, and stores data that has been transmitted from systems, such as GPS. PG&E understands the Commission's request for an asset management database that contains "GIS coordinates" to mean the storage of applicable GPS coordinates for PG&E's electrical assets.

[5] *See* https://www.waze.com/.

unprecedented, and untested. This reliance on the public would represent a significant shift in the approach to wildfire mitigation, requiring different technology, robust public education, and coordination amongst different stakeholders.

With this in mind, PG&E sees the primary question in this proceeding as whether and how a mobile application can specifically improve public safety by reducing the risk of catastrophic wildfire associated with utility infrastructure. While PG&E seeks approval to develop a mobile application and appreciates its potential, it is not a forgone conclusion that a mobile application would achieve the intended purpose of wildfire mitigation. In fact, such an application could have unintended negative consequences that increase risk. To best answer this fundamental question, PG&E requests permission to develop and deploy a pilot (described in Section IV below, the "Mobile App Pilot") and use a risk-based framework to evaluate the results of the Mobile App Pilot.

## III. ISSUES TO BE CONSIDERED

### A. Relationship of a Mobile Application to the Risk of Catastrophic Wildfire and PG&E's Wildfire Safety Plan

In order to design a mobile application that would be a useful tool in wildfire mitigation, the Commission and the parties must consider the specific risk drivers for wildfire and tailor the Mobile App Pilot accordingly.

Wildfire risk means the risk that PG&E assets may initiate a wildland fire that is not easily contained. This definition of wildfire risk does not include all ignitions but, instead, focuses on ignitions in areas with elevated fire risk. The approximately 25,200 circuit miles of overhead distribution line and nearly 5,500 circuit miles of overhead transmission lines within High Fire-

Threat Districts[6] (HFTD) define the primary exposure to the risk of catastrophic wildfire related to PG&E's facilities.[7] Based on PG&E's historical data from 2015-2017, within the HFTD, the primary risk drivers are vegetation contact (49 percent) and equipment failure (27 percent).[8] Other risk drivers include third-party contact with conductor (13 percent), animals (8 percent), fuse operation (1 percent), and unknown (3 percent)[9] Additionally, distribution lines present significantly more risk than transmission lines (i.e., 1.5 ignitions per 100 miles for distribution compared to 0.5 ignitions per 100 miles for transmission) and have different risk profiles (e.g., transmission lines have reduced risk of vegetation caused ignitions).[10]

Given these risk factors, PG&E would focus development of the Mobile App Pilot to primarily address vegetation contact and equipment failure. Moreover, as the Mobile App Pilot would allow the public to report "potential problems" associated with "utility infrastructure (e.g., poles),"[11] it would be focused on PG&E's assets, and, more precisely, its assets that are readily visible to the public, which would primarily include PG&E's above-ground electric distribution conductors and associated structures and its transmission conductors and associated structures. PG&E anticipates that the Mobile App Pilot would have little to no connection to underground assets, like PG&E's gas distribution and transmission systems, or assets where public access is discouraged and prohibited, like PG&E's transmission and distribution substations.

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[6] The HFTD Map designates three areas where there is an increased risk from wildfires: Tier 3 (extreme fire risk), Tier 2 (elevated fire risk), and Zone 1 (USFS and CAL FIRE Tree Mortality High Hazard Zone Tier One is not included in Tier 3 or Tier 2).

[7] PG&E, *Pacific Gas and Electric Company Amended 2019 Wildfire Safety Plan* (Feb. 6, 2019), at p. 25, available at: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/Wildfire-Safety-Plan.pdf.

[8] *Id*. at p. 26.

[9] *Id*.

[10] *Id*. at p. 28.

[11] I.19-06-015 at p. 18.

Moreover, the Mobile App Pilot would, in effect, parallel PG&E's Wildfire Safety Inspection Program (WSIP) and Enhanced Vegetation Management programs. PG&E details these two programs, along with other programs and strategies to prevent wildfires, in its 2019 Wildfire Safety Plan.[12] The 2019 Wildfire Safety Plan built on PG&E's 2017 Risk Assessment and Mitigation Phase (RAMP) Report.[13] Through the 2019 WSIP Distribution and Transmission programs, PG&E is inspecting approximately 700,000 distribution and 50,000 transmission[14] structures using enhanced inspection methodologies in the HFTDs. PG&E's Enhanced Vegetation Management program includes overhang clearing (i.e., removing branches and limbs directly above but outside GO 95 radial clearance), identifying and trimming or removing at-risk tree species, and fuel reduction through ground to conductor clearance.

**B. Risk Based Framework for Evaluating the Mobile App Pilot**

Based on the risk framework described above, PG&E anticipates that, for a mobile application to meaningfully mitigate the risk of catastrophic wildfire, the mobile application should, at a minimum:

1) identify genuine safety issues that pose an ignition risk;

2) be used in areas with fire risk; and

3) identify unique issues that were not and would not have been identified by PG&E's own inspection programs.

The mobile application's utility in reducing the risk of catastrophic wildfire should be measured

[12] PG&E, *Pacific Gas and Electric Company Amended 2019 Wildfire Safety Plan* (Feb. 6, 2019), available at: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/Wildfire-Safety-Plan.pdf.

[13] PG&E, *2017 Risk Assessment and Mitigation Phase Report of Pacific Gas and Electric Company* (Nov. 30, 2017), report available below the "2017 Milestones" heading at: http://www.pgecorp.com/corp_responsibility/reports/2018/bu03_risk_management.html.

[14] *See* https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-safety-inspection-program.page.

against the diversion of resources from other wildfire mitigation efforts that may be caused by the mobile application, namely, how much use of the mobile application would require a response to:

1) submittals that do not report an ignition risk;

2) issues outside of high fire threat areas; and/or

3) issues that would have been otherwise identified by PG&E (i.e., potential for duplication and suboptimal resource allocation).

### 1. User Submittals Must Identify Genuine Safety Issues and Avoid False Positives

PG&E believes that identifying safety issues related to electric infrastructure is fundamentally different from other mobile reporting applications, like those administered by the City of San Francisco and BART, which allow members of the public to report concerns and file complaints.

As an initial matter, an individual may have difficulty identifying PG&E infrastructure. An individual may misidentify an asset as belonging to PG&E, the location of an asset (e.g., a pole in a rural area) may be difficult to identify, and something that may be problematic from an untrained perspective may not be an issue at all. For example, PG&E's poles typically contain both electric and communications assets, and these assets have dramatically different risk profiles and are likely indistinguishable to an untrained individual.

Even if a proper PG&E asset is identified, to be useful in mitigating wildfires, users would have to identify ignition risks (e.g., a broken cross arm) that are connected to one of the risk drivers described above. Furthermore, while the general public may provide a photo of an alleged issue, the photo may not be sufficiently clear or close enough to the alleged issue for PG&E to identify whether there is a genuine issue. In either case, PG&E personnel would be deployed to respond to potential false positives, which would divert skilled and limited personnel, both in the office

and the field, from actual risk mitigation work. The impact of resource diversion is a significant concern for PG&E given the likelihood that users could submit misidentified issues.

The Mobile App Pilot would allow PG&E and the Commission to evaluate the ability of the public to identify potential safety issues that are a risk of ignition. PG&E and the Commission can align on how to limit the types of issues that can be reported, what type of user training is needed to help the user identify relevant infrastructure and describe the specific issues, and what tools can be incorporated in the Mobile App Pilot to help the user (e.g., maps, drawing tools, highlighting, etc.)—all of which are necessary to develop a product that can actually reduce wildfire risk.

**2. User Submittals Should Be Targeted to High Fire Risk Areas**

While every catastrophic wildfire begins with an ignition, not every ignition leads to a catastrophic wildfire. Recognizing this, PG&E focuses its mitigation efforts on the HFTD maps, which outline areas of extreme fire risk (Tier 3), elevated fire risk (Tier 2), and areas of elevated tree mortality (Zone 1). Most of PG&E's customers reside in Tier 1 areas with low to no risk of wildfire or wildfire ignition. Similarly, much of PG&E's distribution and (especially) transmission lines within the Tier 3 and Tier 2 areas traverse remote areas that are distant from and are even inaccessible to the public in certain cases, making it unlikely that the general public could be useful in identifying issues in those areas. While PG&E is concerned with the safety of all of its assets, given the context of mitigating the risk of catastrophic wildfire, the Mobile App Pilot would address the users and areas within the HFTD.

**3. User Submittals Should Complement PG&E's Existing Programs**

Finally, as described previously, the Mobile App Pilot should support existing inspection, maintenance, and vegetation programs, including PG&E's routine patrols, enhanced WSIP inspections, and with the Distribution and Transmission and Enhanced Vegetation Management

programs in HFTD areas. Users could augment these programs by identifying critical safety issues that might emerge between inspection cycles. However, to the extent that users identify longer-lead maintenance issues (e.g., those with repair timelines of 12 months or greater), they would likely duplicate PG&E's existing programs. Additionally, for submittals where the priority of the issue would be unclear, PG&E likely would have to send a crew of qualified personnel out to investigate, again, potentially diverting limited and qualified personnel away from higher priority work. PG&E also would want to consider how to design and train the public to use the mobile application so that it would not supplant existing methods of reporting urgent safety situations (e.g., calling 911 to report a line down situation).

**4. Other Public Safety Concerns**

Wildfire is not the only safety risk associated with PG&E's electric distribution and transmission assets. PG&E's electric assets are dangerous and frequently located high above the ground. Third-party contact with an intact conductor (i.e., a conductor that is in its intended position) or climbing upon PG&E facilities pose a real public safety risk. Moreover, such assets may be found on private property.

Of course, neither PG&E nor the Commission intends to encourage members of the public to seek close contact with PG&E's electric assets, trespass on private property to gain access to such assets, or violate someone's privacy rights in photographing private property as part of reporting a perceived issue. However, these may be unintended consequences of allowing unfettered public reporting. Moreover, PG&E would not want users to create unsafe conditions by using the Mobile App Pilot, for example, while driving.

Given these concerns, prior to developing and releasing the Mobile App Pilot, PG&E and the Commission should be required to develop laws, rules, and guidelines, as necessary, to protect members of the public when using the Mobile App Pilot and other stakeholders from liability that

might arise from operating or relying on the Mobile App Pilot.

## IV. PROPOSED PILOT AND DEPLOYMENT OF MOBILE APPLICATION AND APPLICATION MANAGEMENT SYSTEM

### A. Mobile App Pilot Overview

As described above, the efficacy of a mobile application in reducing catastrophic wildfire risk has not been tested. To ensure that the mobile application effectively maximizes the potential of the public to contribute to maintenance of its assets while appropriately solving the issues identified above, PG&E proposes to develop and launch a pilot program with a limited number of users in a subset of PG&E's service territory. While PG&E will not request cost recovery for the Mobile App Pilot, PG&E respectfully requests that any decision about who bears the cost of any further development and continued operation[15] be deferred until after a fuller understanding can be developed through the Mobile App Pilot. PG&E reserves the right to request incremental recovery in the future.

In general, the Mobile App Pilot would allow PG&E to:

- develop appropriate customer outreach, training, and education to use the Mobile App Pilot;
- measure customer use and engagement with the product;
- build adequate privacy and security safeguards;
- assess the effectiveness of a mobile application in reducing potential catastrophic wildfire risk;
- partner with other utilities to ensure that PG&E's Mobile App Pilot can be

[15] PG&E understands the cost of development and continued operation as referring to expenditures limited to developing the actual mobile application and support systems (e.g., the cost to build the mobile application) and not the cost to respond to submittals (e.g., sending a worker to inspect an asset), which would be covered through PG&E's normal operations budget.

leveraged by others; and

- develop reasonably accurate cost models for widespread deployment and maintenance.

By creating a pilot that is targeted at a narrow subset of the community with an emphasis on a Tier 3 HFTD location, PG&E aims to work with those members of the public who are most at risk of wildfire and test this new approach of a crowdsourced safety issue identification process in a manageable population size. Additionally, PG&E proposes to work with the Safety and Enforcement Division (SED) of the Commission on the development of the Mobile App Pilot.

Finally, as described in Section VI.B.5, PG&E has proposed a schedule for the development and Commission approval of the Mobile App Pilot. Briefly, PG&E would develop the Mobile App Pilot as follows: 1) a Prehearing Conference would be held and a Scoping Memo issued outlining, among other things, the issues to be considered; 2) SED, with PG&E's assistance, would facilitate one or more workshops to discuss the Mobile App Pilot and receive initial feedback; 3) based on this feedback, PG&E would develop a Preliminary Implementation Plan, which would be served on parties for comment; 4) PG&E would prepare a Final Implementation Plan, which would outline its response to parties' comments and any updates to the Implementation Plan; 5) the Commission would approve the final version of the Mobile App Pilot; and 6) PG&E would launch the Mobile App Pilot working with SED to monitor implementation.

## V. MOBILE APPLICATION AND SUPPORT SYSTEMS

In Section V, PG&E describes the mobile application and support systems that would be part of the Mobile App Pilot. PG&E intends to consider third-party product offerings, as well as internal solution options as part of its technology evaluation process. To implement the solution, PG&E anticipates using both internal and external labor to meet the needs of the request. In the

section below, PG&E describes some of the key components or modules of the solution.

### A. Mobile Application

PG&E proposes to develop the Mobile App Pilot on iOS and Android platforms. The Mobile App Pilot would allow users to report to PG&E certain identified issues regarding PG&E infrastructure. A user would need to register (i.e., provide contact information) so that PG&E can contact the user with any questions about the issue reported. The registration process is expected to provide training to the user on how to distinguish between emergency conditions and potential equipment or vegetation problems. Registration will also serve to deter potential misuse of the application.

To submit an issue, the user would select the issue observed from a list, add photos taken of the issue, and provide any additional comments about the issue or location. Because the Mobile App Pilot will include location-enabled functionality, PG&E will develop—and the user will be required to accept—terms and conditions that permit PG&E access to the user's location. Upon completion, the sender would receive an auto-generated acknowledgement of their submittal from PG&E.

The information obtained through the Mobile App Pilot will be routed to a team at PG&E that will review and triage the information. The team will determine if additional information is needed (e.g., a clearer photo), determine what type of response is required (i.e., an immediate or non-immediate response), and communicate with the user, if necessary. As part of the Mobile App Pilot, PG&E will work on a process to handle situations where no PG&E assets are involved. Additionally, PG&E will remind customers that the Mobile App Pilot is not intended to be used for reporting emergency situations and will instruct users to report such issues directly to 911.

To ensure that PG&E can respond adequately to a report submitted through the Mobile

App Pilot, the individual who makes the submittal should be required to provide contact information if PG&E responders have follow up questions. PG&E would, therefore, need to ensure that the Mobile App Pilot provides adequate privacy and security for its users.

**B. Information Platform**

The OII states that the mobile application should be "open source." Technically, the phrase open source means that the mobile application's original source code would be publicly available and subject to modification and redistribution by third parties. Having such an open and publicly available source code would introduce new cyber security risks to PG&E's IT infrastructure. To address these risks while complying with the OII, PG&E plans to proceed with developing a mobile application that has an "open API," which means that there would be a publicly available interface for the Mobile App Pilot, but PG&E would maintain property ownership over the original source code for the mobile application.

Information provided through the Mobile App Pilot will be integrated into PG&E systems, which will include photos, location details, and asset specific operations and maintenance records. Within 30 days of an issue being reported, users will be able to access information relating to their submittal (e.g., photos taken, location of the issue, whether the reported issue, in fact, identified a problem, and how the issue has been or is being resolved).

PG&E currently maintains information, including GPS coordinates and operations and maintenance records, about its various infrastructure assets. As part of the Mobile App Pilot, PG&E will consider what, if any, additional capabilities or information is necessary for responding to issues raised by Mobile App Pilot users. PG&E will disclose to SED the information gathered as part of the Mobile App Pilot and will work with SED on how this additional information should be incorporated in its existing operations and maintenance records.

## VI. COMPLIANCE WITH THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE

### A. Statutory Authority

This Application is filed pursuant to the Order Instituting Investigation and Order to Show Cause (I.19-06-015) and the Commission's Rules of Practice and Procedure and prior decisions, orders, and resolutions of this Commission.

### B. Categorization, Hearings, and Issues to Be Considered (Rule 7)

#### 1. Proposed Category

PG&E proposes that this Application be categorized as a "ratesetting" proceeding.[16]

#### 2. Relevant Safety Considerations—Rule 2.1(c)

In D.16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring applications to clearly state the "relevant safety considerations." PG&E discusses relevant safety considerations in Section III of this Application.

#### 3. Need for Hearing—Rule 2.1(c)

PG&E does not believe that approval of this Application will require hearings.

#### 4. Issues to be Considered

As described in Section III of this Application, the principal issue is whether and how a mobile application can reduce the risk of catastrophic wildfire in PG&E's service territory. This overarching issue includes the following considerations:

- Whether users of a mobile application would be able to identify ignition risks in high fire-threat areas that would not have been discovered by PG&E's own patrols

[16] *See* Rule 1.3(f); Rule 7.1(e)(2) ("When a proceeding does not clearly fit into any of the categories as defined in Rules 1.3(a), (d), and (e), the proceeding will be conducted under the rules applicable to the ratesetting category unless and until the Commission determines that the rules applicable to one of the other categories, or some hybrid of the rules, are best suited to the proceeding.").

and inspections in a timely manner;

- How to minimize "false positives" generated by users of a mobile application; and
- How to mitigate safety risks inherent in asking the public to report on electric infrastructure.

**5. Proposed Schedule—Rule 2.1(c)**

| | |
|---|---|
| File Application | July 29, 2019 |
| Protests Due | August 29, 2019 |
| Reply to Protests | September 9, 2019 |
| Prehearing Conference | September 16, 2019 |
| PG&E Procedural Motion to Schedule Workshop(s) on Mobile Application and Support System | September 23, 2019 |
| Scoping Memo | October 2019 |
| Workshop on Mobile Application and Support Systems | October 2019 |
| PG&E Files Pilot Implementation Plan | December 2019 |
| Parties Comment on PG&E Pilot Implementation Plan | +20 Days after PG&E Files Implementation Plan |
| PG&E Replies to Comments on PG&E Pilot Implementation Plan | +10 Days after Opening Comments on Implementation Plan |
| Proposed Decision | February 2020 |
| Decision | March 2020 |

**C. Legal Name and Principal Place of Business—Rule 2.1(a)**

Applicant's legal name is Pacific Gas and Electric Company. Applicant's principal place of business is San Francisco, California. Its mailing address is Post Office Box 7442, San Francisco, California 94120. Since October 10, 1905, applicant has been an operating public

utility corporation, organized under the laws of the State of California.

### D. Correspondence and Communication Regarding This Application (Rule (2.1(b))

All correspondence, communications, and service of papers regarding this Application should be directed to:


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P.O. Box 7442
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Facsimile: (415) 973-0942
E-Mail: matthew.plummer@pge.com


### E. Articles of Incorporation—Rule 2.2

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, is on record before the Commission in connection with PG&E's Application 04-05-005, filed with the Commission on May 3, 2004. These articles are incorporated herein by reference pursuant to Rule 16 of the Commission's Rules.

### F. Balance Sheet and Income Statement—Rule 3.2(a)(1)

PG&E's most current balance sheet and income statement for the period ending March 31, 2019 were filed on June 3, 2019 in Application 19-06-001 and are incorporated herein by reference.

### G. General Description of PG&E's Electric and Gas Department Plant—Rule 3.2(a)(4)

Because this submittal is not a general rate application, this requirement is not applicable.

### H. Summary of Earnings—Rule 3.2(a)(5) and (6)

A summary of recorded 2018 revenues, expenses, rate cases, and rate of return for PG&E's Electric and Gas Departments was filed with the Commission on April 22, 2019 in Application 19-04-015 and is incorporated herein by reference.

### I. Most Recent Proxy Statement—Rule 3.2(a)(8)

PG&E's most recent proxy statement, dated May 17, 2019, was filed on June 3, 2019 in Application 19-06-001 and is incorporated herein by reference.

### J. Type of Rate Change Requested—Rule 3.2(a)(3)

Because this submittal is not requesting a change in rates, this requirement is not applicable.

### K. Notice to Government Entities—Rule 3.2(b)

Because this submittal is not requesting a change in rates, this requirement is not applicable.

### L. Publication—Rule 3.2(c)

Because this submittal is not requesting a change in rates, this requirement is not applicable.

### M. Notice to Customers—Rule 3.2(d)

Because this submittal is not requesting a change in rates, this requirement is not applicable.

### N. Exhibit List and Statement of Readiness

PG&E is ready to proceed with this case based on the Application.

## VII. REQUEST FOR COMMISSION ORDER

PG&E requests that the Commission issue an appropriate order approving PG&E's proposed mobile application and support systems pilot in response to the Commission's order to

file an application for an open source, publicly available mobile application, and asset management system/database.

Respectfully Submitted,

SUMEET SINGH

By: /s/ Sumeet Singh
SUMEET SINGH
Vice President, Risk Management
and Community Wildfire Safety

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Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: July 29, 2019

VERIFICATION

I, the undersigned, say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the CPUC to make this Verification for and on behalf of said corporation, and I make this Verification for that reason.

I have read the foregoing Application, and I am informed and believe the matters therein are true, and, on that ground, I allege that the matters stated therein are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California this 26th day of July 2019.

By: _____

SUMEET SINGH
Vice President, Risk Management and
Community Wildfire Safety