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06/18/24

04:59 PM

A1907019

**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.

(U 39 E)

Application 19-07-019  
(Filed July 29, 2019)

**COMMENTS AND OBJECTIONS OF PACIFIC GAS AND  
ELECTRIC COMPANY (U 39 E) TO COMMISSION'S  
SAFETY POLICY DIVISION'S RESPONSE TO PACIFIC  
GAS AND ELECTRIC COMPANY'S STRAW PROPOSAL**

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Dated: June 18, 2024

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**COMMENTS AND OBJECTIONS OF PACIFIC GAS AND  
ELECTRIC COMPANY (U 39 E) TO SAFETY POLICY  
DIVISION'S RESPONSE TO PACIFIC GAS AND  
ELECTRIC COMPANY'S STRAW PROPOSAL**

Pacific Gas and Electric Company (PG&E) submits these comments and objections to the Commission's Safety Policy Division's response to PG&E's straw proposal filed on June 4, 2024.

**I. BACKGROUND**

Pursuant to the Order Instituting Investigation and Order to Show Cause filed on June 27, 2019 (I.19-06-015), on July 29, 2019, PG&E filed a Mobile Application and Supporting Systems Pilot (Application). On October 12, 2020, the Commission approved PG&E's application with Decision 20-10-003 (Decision) and thereafter with Order Correcting Error in Decision 20-12-001 (Order). PG&E launched its safety Mobile App Pilot (Report It) on July 28, 2021. PG&E has filed quarterly status reports since, providing data on everything from updates to the Mobile App, to the number of submissions reported, to number of submissions closed, to the number of valid, invalid and new safety concerns previously unknown to PG&E, to the status of marketing campaigns. In consultation with the Commission's Safety Policy Division (SPD), PG&E hired Opinion Dynamics (OD) to evaluate the feasibility, obstacles, and benefits to integrating into the existing complaint-intake system over 2023.<sup>1</sup>

The OD Report filed on August 25, 2023 (OD Report) and subsequent amendment to the

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<sup>1</sup> Order, ordering paragraphs 3 and 4

OD Report filed on September 29, 2023 (Amended Report) analyzed data since the Mobile App Pilot's start in July 2021 and concluded that "PG&E Report It is effective at preventing wildfire and improving public safety. More than one-fifth of the safety reports submitted from the app's launch in July 2021 to mid-February 2023 were identified as ignition risks. Forty percent of submissions constituted actual safety concerns (i.e., posed hazards including and beyond wildfire) and were not previously known to PG&E."<sup>2</sup> Additionally, the OD Report recommends the Report It app be elevated out of pilot status to become a permanent electric safety program.<sup>3</sup>

PG&E agrees with the OD Report finding the Mobile App as a success and filed its Report It Mobile Application Straw Proposal on September 29, 2023, providing three options for the Mobile App's future. Option 1 eliminates the applications via the Apple and Android versions, and instead would solely be a web-based platform. This is the lowest cost and most accessible across all income groups. Option 2 continues with the mobile applications essentially status quo with incremental maintenance. Option 3 continues with the mobile applications and adds the web-based version. This is the highest cost option. Both PG&E and SPD recommend moving forward with Option 1. PG&E also agrees with the OD Report that the Mobile App should be transitioned from pilot to permanent status and thereafter that PG&E is eligible to submit costs for the Mobile App through the general rate case.

SPD filed SPD's Response to PG&E Mobile App Straw Proposal and Consultant Report on June 4, 2024 (SPD's Response). SPD's Response concludes that SPD cannot support a recommendation to change the Mobile App status to permanent because the OD Report did not make necessary evaluations to enable Staff to draw conclusions on the Mobile App impacting safety – specifically to positively impact PG&E's safety record. Additionally, SPD alleges that PG&E has been untimely in resolving Report It issues. PG&E whole-heartedly disagrees with SPD's Response alleging the Report It app has not positively impacted safety and that PG&E

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<sup>2</sup> OD Report p. 57

<sup>3</sup> OD Report p. 59

was delinquent in resolving Report It safety issues, and addresses these both below.

## **II. DISCUSSION**

SPD's Response contains two allegations at the outset: 1) inconclusive findings impacting safety; and 2) delinquent resolution of safety complaints submitted through Mobile App.<sup>4</sup> SPD's Response develops these two allegations through a set of 5 Conditions which SPD argues PG&E must meet prior to being allowed to move the Mobile App program to permanent status.<sup>5</sup> PG&E will address these completely unsupported and untrue allegations below and then again summarily in PG&E's Comments on each of the Conditions.

### **A. SPD's Allegation of PG&E's Untimeliness to Resolve Safety Complaints is Inaccurate and Conflicts with the General Order Requirements**

Section 1.3 of SPD's Response alleges, without referencing one actual example, "[s]taff have found instances of unresolved Mobile App-derived safety reports open for more than one year or more despite PG&E responses log on the Mobile App pledging a corrective action by a set date that has passed."<sup>6</sup> This statement contains three assumptions that require discussion. The first is the assumption that a safety issue will reflect its closure in the application immediately upon completion of the correction action. It does not. There is at least a two-week delay between taking a corrective action in the field and closing out a submission on the application. However, this presents no safety risk or inaccuracy; it just reflects the time it takes to verify completion of the corrective action.

The second is the assumption that Mobile App-derived safety reports must be closed within a year otherwise PG&E is acting unsafely. The third assumption is that if PG&E reassigns a new date to complete work for a Mobile App-derived safety report, that PG&E is acting unsafely. Both assumptions are also wrong. Therefore, SPD's recommendations based on these wrong assumptions found in Conditions 4 and 5, are not effective or valuable and are

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<sup>4</sup> SPD's Response p. 4

<sup>5</sup> SPD's Response p. 14

<sup>6</sup> SPD's Response p. 12.

entirely misplaced.

PG&E is required by General Order 95 Rule 18 (Rule 18) to take appropriate corrective action to remedy safety hazards posed by our facilities.<sup>7</sup> PG&E has an auditable maintenance program, as required by Rule 18. Rule 18(A) states:

There shall be 3 priority levels.

(i) Level 1:

- Immediate safety and/or reliability risk with high probability for significant impact.
- Take action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.

(ii) Level 2:

- Variable (non-immediate high to low) safety and/or reliability risk.
- Take action to correct within specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower priority). Time period for correction to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for nonconformances that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for nonconformances that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for nonconformances that compromise worker safety; and (4) 59 months for all other Level 2 nonconformances.

(iii) Level 3:

- Acceptable safety and/or reliability risk.
- Take action (re-inspect, re-evaluate, or repair) as appropriate.

b) Correction times may be extended under reasonable circumstances, such as:

- Third party refusal
- Customer issue
- No access
- Permits required
- System emergencies (e.g. fires, severe weather conditions)

PG&E prioritizes corrective actions according to priority level and assigns a tag to each action. The chart below summarizes PG&E's tag system pursuant to the Rule 18 Priority Levels.

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<sup>7</sup> California Public Utilities Commission General Order 95 Rule 18.A.(1)(a)

<b>GO 95 Rule 18 Priority Levels</b>	<b>PG&amp;E Tag</b>	<b>Tier 3</b>	<b>Tier 2/HFRA</b>	<b>Non-HFTD</b>
Level 1	A	24 hours	24 hours	24 hours
Level 2	X	5 days	5 days	5 days
	B	6 months	6 months	6 months
	E	6 months	12 months	36 months
Level 3	F	60 months	60 months	60 months

Rule 18 also identifies that correction times may be extended under reasonable circumstances, such as a third-party refusal, customer issue, permit required, no access, and system emergencies.<sup>8</sup>

Given that the Report It tool is not appropriate to report emergencies, corresponding to Priority Level 1 in Rule 18, we can take these priority level reports out of this discussion. We are left with those reports that are either Level 2 or Level 3 per Rule 18 and have anywhere from six months to 59 months to address the safety issue if there is one. And PG&E assigns a tag for correction between 5 days to 36 months. Therefore, anecdotal observations by SPF staff that a Report It report remained open for over a year should not carry with it the connotation that PG&E was delinquent or that safety was compromised. Such an assumption would disregard Rule 18 entirely.

Similarly changing a date for work on the Mobile App website or moving the corrective date out *also* should not be assumed to reflect a lack of diligence or safety-focus. Not only does Rule 18 specifically allow corrections to be extended beyond the requirements of Rule 18 itself, but SPD's Response inaccurately implies that any moving of the corrective date identified on the website means the correction will take place beyond the requirement of Rule 18. That is just not the case. For example, a submission could have a Level 2 Priority requiring 12 months to correct the safety hazard which PG&E assigns a corrective action date for 4 months out. If PG&E then moves the date out to 8 months, there is no delinquency. Nor is there if PG&E moves the date out again for reasonable circumstances beyond the 12-month requirement, perhaps for storm response and impassable road conditions.

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<sup>8</sup> California Public Utilities Commission General Order 95 Rule 18.A(2)(b)

A safety report submitted through the Mobile App is not treated differently or given a higher priority than other safety reports that either come in from the public to the call center or otherwise or are submitted by PG&E inspectors. We use the same Tag system regardless of how the issue comes to us, which is governed by Rule 18. There is nothing in the Decision which suggests or requires treating Mobile App submissions differently regarding priority level.

Therefore, PG&E would be remiss to fail to mention that SPD's Response which recommends defining "delinquent unresolved safety complaints" as those that "remain unresolved after nine months or more"<sup>9</sup> from the date of user submission, as beyond the scope of the Decision, unsupported legally and anecdotally, and duplicative and in conflict with General Order 95 Rule 18(A). PG&E already has an auditable maintenance program which tracks all safety hazards found not just those submitted by the Mobile App users, as required by Rule 18. Condition 4 of SPD's Report, which suggests PG&E track and report on safety issues separately if submitted via the Mobile App<sup>10</sup>, issues which are already being tracked via the auditable maintenance program, would be a waste of time, money, and resources, but most importantly, would not expose a problem since Rule 18 does not define resolving safety issues after 9 months as delinquent.

In fact, PG&E tracks Key Performance Indicators (KPIs) for its Mobile App program and PG&E is currently averaging 16 hours to triage (review the mobile app submission) and 116 days to remediate safety hazards in the field (complete the remedial actions/corrective actions by either way of construction or repair methods) (this is the date when the remedial action was or will be taken).

**B. SPD's Response stating Mobile App is Inconclusive at Improving Safety is Not Supported by the Record**

SPD's Response states the "key consideration for staff to weigh in assessing the Mobile

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<sup>9</sup> SPD's Response p. 14.

<sup>10</sup> SPD's Response p. 15.

App and potential next steps is whether the initiative has any tangible impact on safety.”<sup>11</sup> While the Consultant Report (OD Report) contains useful information on safety, the Mobile App’s “criticality was less clearly articulated” and was absent “of measurable data to inform any resulting favorable safety impacts”<sup>12</sup> per SPD’s Response. They continue by framing two questions that to SPD remain unanswered:

- 1) Were critical safety issues brought to light that may not have been identified otherwise or addressed as rapidly, and
- 2) What share of “invalid” or non-safety reports served as a distraction or interfered with PG&E’s ability to address true safety concerns of the kind identified by standard inspections?<sup>13</sup>

Finally, SPD’s Response suggests that because of these “incomplete, inconclusive and less than compelling data and findings surrounding tangible safety impact benefits...” “...staff at this time is unable to support recategorizing the pilot to permanent program status.”<sup>14</sup>

PG&E argues that SPD’s Response has completely missed the requirements and the goals of the Mobile App in improving safety, all of which are captured in the Decision and the OD Report, not to mention in PG&E’s Report It Quarterly Reports, and therefore not recategorizing to permanent program status would not be supported by the information in this proceeding’s record.

The Decision ordered PG&E to “retain a qualified independent consultant to perform an evaluation of the pilot within Phase 1 of this proceeding and...to consult with SPD, as part of this evaluation, on the merits of including the criteria suggested herein, at Attachment A.”<sup>15</sup> The OD Report included findings on each of the 15 criteria in Attachment A which are presented in

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<sup>11</sup> SPD’s Response p. 11

<sup>12</sup> Id.

<sup>13</sup> Id.

<sup>14</sup> Id.

<sup>15</sup> Decision p. 41.



Table 22 of Appendix H. Per Item No. 3 of Table 22, “Has safety improved” by using the Mobile App., OD Report concluded they were able to fully evaluate based on data collected in Table 8, copied below.

Table 8. Count of Safety Issues Not Previously Identified by PG&E

Concern Type	Valid No Safety Concern	Valid with Safety Concern	Invalid	TBD	Total
Other Electrical	18	23	70	1	112
PGE Equipment	29	49	66	5	149
Power Line	33	47	117	21	218
Power Pole	64	161	83	17	325
Tree or Vine	267	373	146	31	817
Subtotal	411	653	482	75	1,621
Percent of Total	25%	40%	30%	5%	100%

“Nearly half of the valid safety concerns reported in the app were not previously known to PG&E. Of the 1,621 unique PG&E Report It submissions, 653 (40%) were flagged as valid safety issues not already identified by PG&E before being submitted through PG&E Report It (Table 8).” SPD’s Question 1 was clearly answered in the OD evaluation report table 8.

Additionally, PG&E’s most recent analysis shows that on average in both HFTD and Non-HFTD, cases were reported 21 months before the next schedule inspection. This number reflects the high number of non-HFTD submissions submitted through the Mobile App (non-HFTD OH Electric inspection cycle is 5 years) and proves the efficacy of the program to find issues more rapidly and/or unknown to PG&E based on geographic location when compared to the inspection timeline cycle.

Question 2 in SPD’s Response is addressed by OD Report finding that “612 safety concerns were duplicate submissions, 413 of which were already known to PG&E”<sup>16</sup> and data can be found in Table 9 copied below. “Duplicates are to be expected and should be considered a positive outcome since they indicate multiple app users are identifying the same problems...”<sup>17</sup> With 653 unique and valid safety issues not already identified by PG&E submitted by the Mobile App, PG&E is at a loss at SPD’s Response stating the safety impact is inconclusive.

Table 9. Number and Percentage of Submissions Deemed Emergencies

Safety Issue Type	Valid	Invalid Submissions				Total Invalid
	Total Valid	Emergency	Gas	N/A	Non-PG&E Asset	
Tree or Vine	650	21	4	24	118	167
Power Pole	229	12	2	38	44	96
Power Line	87	53	0	9	69	131
PG&E Equipment	76	19	21	14	19	73
Other Electrical	36	30	3	12	31	76
<b>Total</b>	<b>1,078</b>	<b>135</b>	<b>30</b>	<b>97</b>	<b>281</b>	<b>543</b>
% of All Submissions	67%	8%	2%	6%	17%	33%
% of Invalid Submissions	—	25%	6%	18%	52%	100%

Additionally, regarding question 2 of SPD’s Report, whether invalid cases are distracting PG&E resources away from valid safety work, PG&E believes the invalid cases have not been as burdensome as expected. PG&E will always have a percentage of invalid cases from the public, whether they are submitted through the Report It app or call center or otherwise.

In the normal course of business and triage processing, the invalid cases do not take excessive time or effort to triage vs valid cases. In general, invalid emergency cases take a slightly increased amount of time due to the follow up and closure processes surrounding the submission and the critical nature of the work.

While Table 22 reflects that OD Report was not able to evaluate the avoided costs of wildfires because of the uncertainty of the likelihood and scale of the avoided fires, it is relevant

<sup>16</sup> OD Report p. 46

<sup>17</sup> Id.

to consider that “the cost to replace a transformer...ranges from \$3,000 to \$150,000”<sup>18</sup> and that “any of the 350+ actual ignition risks could have sparked a wildfire”, “the estimated cost of the Camp Fire was \$422 billion”, and “PG&E has paid \$5 billion into the PG&E Fire Victims Trust to-date”.<sup>19</sup> PG&E argues that lack of the ability to tie use of the mobile app to an avoided cost does not diminish or negate the positive impact on safety highlighted above.

The OD Report concluded “that PG&E Report It is cost-effectively delivering a critical benefit to PG&E customers and the State’s energy safety goals...”<sup>20</sup> and that the ap “has enabled users to alert PG&E to ignition risks and other safety hazards.”<sup>21</sup> The OD Report finds the PG&E Report It is effective at preventing wildfire and improving public safety. More than one-fifth of the safety reports submitted from the time of the app’s launch in July 2021 to mid-February 2023 were identified as ignition risks. Forty percent of submissions constituted actual safety concerns, (i.e., posed hazards including and beyond wildfire) and were not previously known to PG&E.<sup>22</sup>

Since the app’s launch in July 21 through May 2024, PG&E metrics show that 12% of the valid safety reports submitted through the Report It Mobile App identify ignition risk which reflects 2,027 actual safety concerns not known to PG&E. This is 29% of submissions through the Mobile App.

Equally important, PG&E Report It encourages users to proactively scan their environment for safety concerns. More than half (60%) of active users had never submitted a safety report before, and among them, nearly half (43%) had not previously noticed anything that appeared hazardous. This suggests the app drives greater awareness and vigilance against

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<sup>18</sup> OD Report p. 55

<sup>19</sup> OD Report p. 17

<sup>20</sup> OD Report p. 59

<sup>21</sup> OD Report p. 8

<sup>22</sup> OD Report p. 7

wildfire and public safety risks.<sup>23</sup>

The OD Report also found that the PG&E Report It mobile app users are correctly identifying not only valid safety concerns, but also violations of safety regulations. (Table 11 of the OD Report found users identified 46 violations of safety regulations.) According to PG&E's risk analysis team, 355 submissions (22%) were identified as ignition risks.<sup>24</sup> Of the ignition risks submitted, about two-thirds (62%) required replacing equipment and about one-third (30%) required removing material such as vines, trees, and foreign objects. Actions taken to remedy these situations and their frequency are presented in Table 12 of OD Report. Frequencies by type of ignition risk are provided in Figure 26.

Through the first quarter of 2024, 2,802 instances of a safety concern and/or violation of a safety regulation have been reported via the Report It Mobile App, and PG&E has resolved 1,748 safety related asset issues<sup>25</sup> Of these, 1,149 reported a new safety issue (previously unknown to PG&E).

Therefore, all of the information and data that the two questions in the SPD Response are seeking are already in PG&E's quarterly reports and in the OD Report.

**C. SPD's Recommended Conditions Prior to making the pilot permanent are unnecessary.**

SPD's Report suggests that PG&E's Mobile App should not be transferred to permanent status until five conditions are met.

Condition 1 – SPD suggests that PG&E make a record and report data in its quarterly reports to inform the questions of 1) were critical safety issues brought to light that may not have been identified otherwise, or addressed as rapidly with the Mobile App? and 2) What share of “invalid” or non-safety reports served as a distraction or interfered with PG&E's ability to address legitimate safety concerns of the kind identified by routine inspections?

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<sup>23</sup> OD Report p. 57

<sup>24</sup> OD Report p. 50

<sup>25</sup> PG&E's Q1 2024 Quarterly Status Report on Report It Mobile App, Appendix 2

PG&E's Comments to Condition 1 – DUPLICATIVE and UNNECESSARY:

Data on Question 1 was already captured in the OD Report. Additionally, the total counts of net new (previously not known to PG&E) is already captured and reported in PG&E's quarterly report. (See discussion above in Section B.)

Additional data collection on Question 2 is also unnecessary. Invalid submissions are inherently a part of the program and PG&E has proved to be able to manage all invalid and valid submissions in a timely fashion. While continually improving the invalid processing of cases and the user interface to avoid invalid submissions, customers will inevitably submit invalid cases due to the lack of training and identification of asset-related issues. PG&E continues to report the number of invalid submissions resulting in the most recent quarterly report of 32% of all submissions.<sup>26</sup> The OD Report mentions the invalid submissions would be unavoidable and PG&E has accounted for this in staffing and procedure development. "Furthermore, most submissions related to non-PG&E assets reported trees or vines growing on or touching equipment such as phone and cable wires and boxes (Table 10). This may be unavoidable because vegetation can obscure the wires themselves." Moreover, the impact of Invalid case submissions is and has been minimized by multiple strategies throughout the pilot process.

Condition 2 – SPD suggests PG&E collect sufficient data per Condition 1 to support any future ratepayer funding request PG&E may pursue.

PG&E's Comments to Condition 2 – UNNECESSARY: PG&E has sufficient data. PG&E has hundreds of data points and has produced data to support Condition 1 via the OD Report and PG&E's quarterly reporting to SPD. Additionally, Condition 2's "sufficient data" requirement is subjective.

Condition 3 – SPD suggests PG&E track and trend PG&E staff time expended or diverted by invalid, emergency, or non-safety issue reports and offer proposed solutions.<sup>27</sup>

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<sup>26</sup> OD Report Tables 9 and 10

<sup>27</sup> SPD Report p. 14

Additionally, for poles and conductors, PG&E should characterize and quantify response and resolution times for issues submitted via the Mobile App against average times reported to the call center.

PG&E Comments to Condition 3 – UNNECESSARY and IMPRACTICAL:

The request to track and trend PG&E staff time expended by invalid cases would prove to be inefficient, and not practical for the Report It program. The triage process is multilayered and frequently requires multiple touch points per case per day. Meaning that the triage process starts and stops work depending on the case submission and accurate time tracking to the finite level of time spent per case specifically for Mobile App submissions is unreasonable. The team can track the daily throughput and average case workload capacity, and is unable to track the exact time spent per case due to the program's nature. Each type of invalid case has a unique process to ensure proper documentation and resolution resulting in a wide range of PG&E staff time. PG&E Triage staff have a diverse list of roles and responsibilities that intertwine with case triage and require the team to continually switch between cases, PG&E systems, dashboards, email, and other applications. All the while working to successfully resolve the invalid case submission. Lastly, invalid submissions can require a team pod review to ensure that the correct triage process is followed and would affect the staff time expended along with introducing another layer of “time” used amongst the team. Overall PG&E has and will continue to offer proposed solutions to reduce the invalid submission population.

Complaint tracking through the mobile app is more robust than tracking for similar issues through the call center. Performing the analysis described in Condition 3 to quantify the response and resolution time for complaints reported to the call center will be a significantly manual process. Enhancing the call center process with the tracking needed to meet Condition 3 requirements is outside the scope of the Report It proceeding and Decision, and PG&E argues it is not necessary.

Condition 4 – SPD recommends PG&E track safety complaints submitted via the Mobile App which are unresolved after nine months as delinquent.

PG&E's Comments to Condition 4 – UNNECESSARY and CONFLICT WITH GO 95  
RULE 18 AUDITABLE MAINTENANCE PROGRAM REQUIREMENTS:

PG&E currently tracks and trends the number of “open” (unresolved) case submissions in the quarterly report distributed to the SPD. At no time during the 3-year pilot has there been a request for metrics pertaining to the duration and resolution of case submissions, and so this is a new and recent area of interest for SPD. SPD’s benchmark of 9 months to close a Mobile App submission otherwise it is delinquent is arbitrary to say the least, and inapposite to the General Order 95 Rule 18 which has Levels of Priority and respective completion requirements ranging from immediate to 59 months. (See discussion above in Section A.)

Considering that the variety of case submissions, work requirements, permitting, job coordination, severity of the issue and other aspects of resolving a submission, PG&E is following the standard process and procedures for the prescribed remedial actions. Mobile App submissions do not get escalated or special priority treatment amongst the population of corrective work tickets in the system. Noting that roughly 42% of valid submissions are from outside an HFTD, GO 95 Rule 18 would allow PG&E 3 years to correct these safety issue.<sup>28</sup>

Condition 5 – SPD recommends PG&E commence a mini version of the annual report in Condition 4 to include PG&E’s safety submissions to the Mobile App which remain open for more than 9 months.

PG&E's Comments to Condition 5 – ARBITRARY, NOT SUPPORTED in the  
GENERAL ORDERS and UNNECESSARY:

Since launching the pilot in 2021, PG&E files and serves a quarterly report which is time intensive and robust. The report suggested in Condition 5 is not supported by the General Order 95 Rule 18, is arbitrary by requiring PG&E treat safety issues submitted via the Mobile App differently than others by applying a 9-month requirement to close out regardless of priority and is unnecessary because there are already requirements on deadlines for completion of safety

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<sup>28</sup> OD Report p. 51

issues found at GO 95 Rule 18, as well as reasonable exceptions to such deadlines.

When referring to Attachment A – A.19-07-019 and the evaluability based on these metrics through the ODC evaluation, PG&E was able to meet the evaluability requirements fully or partially on 41 of 43 (95%) metrics associated with the pilot.

**D. PG&E Appreciates SPD Supporting PG&E’s Recommendation to modify from downloadable apps to a single web-based app with Option 1**

“Staff also recommends that PG&E be granted authorization to modify the existing Mobile App approach from two dedicated downloadable apps serving Apple and Android smartphones to a single web-based app that can be accessed by any internet-enabled device to dispense with the need to undertake ongoing software updates to facilities changes made in Android or Apple smartphone operating systems.”<sup>29</sup>

Option 1 is PG&E’s preference “from a consumer-delivery perspective and the many existing problems it resolves...” increasing functionality, and equity “in its ability to better serve users of older smartphones who are more likely to be low income. For this reason, Option 1 can be said to be more just than Option 2, which closely resembles a continuation of the status quo.”<sup>30</sup>

However, SPD is mistaken that Option 1 would “obviate PG&E’s practice of throttling new users who wish to submit reports without delay”.<sup>31</sup> For the mobile app pilot, PG&E was ordered to include all customers located in Tier 2 and Tier 3 High Fire Threat Districts (HFTDs) (Ordering Paragraph 1 (g)). All PG&E customers located in Tier 2 and Tier 3 HFTDs who PG&E had email addresses for were provided immediate access to submit a report through the mobile app. Rather than restrict users outside of Tier 2 and Tier 3 HFTDs from being able to use the mobile app, PG&E developed a registration process for all other email addresses. This was implemented to ensure that PG&E’s Triage team could manage the submission volume and were

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<sup>29</sup> SPD Report p. 5

<sup>30</sup> SPD Report p. 9

<sup>31</sup> SPD Report p. 8



not inundated with submissions that were outside the scope of the pilot (i.e., outside of Tier 2 and Tier 3 HFTDs). Initially, new users who went through the registration process were approved on a weekly basis. In Q4 2022, PG&E changed this to daily. In Q1 2024, PG&E removed the wait period so that new users could submit a report immediately. Note that the registration functionality is part of the backend database functionality used by the mobile app and would not change if the frontend user interface changes to a web page.

Additionally, SPD's recommendation of implementing a new web-based "app" within six months' time is too aggressive and not reasonable. If PG&E is ordered to implement Option 1, PG&E requests a *similar* timeline to implement the web-based "app" as was given for the mobile app: as soon as practicable but within 12 months from the effective date of [the] decision.<sup>32</sup> (Ordering Paragraph 1 (j)). PG&E plans to use the existing backend database but will need to recreate the user interface on the web. This includes building a new map tool to replicate the map functionality within the mobile app. Based on PG&E's past experience integrating maps into web pages, PG&E requests a 12-month timeframe to implement the web-based "app".

**E. Making the Pilot Permanent and Allowing for Rate Recovery is Appropriate Now**

PG&E has exceeded the expectations of the pilot by willingly taking on enhancements, staffing, reporting and integration of the Mobile App. There is a proven need and value of continuing the program which would require rate recovery. Along with future enhancements to better serve the customers and continue to improve safety, rate recovery would expedite those actions. A continuation of the pilot status would leave PG&E in a position where we cannot implement desired outcomes such as but not limited to permanent staffing and further expansion of the program. When compared to the billions spent on wildfire prevention, the mobile app is a percentage of these costs and has produced significant wildfire and safety prevention results. PG&E agrees either in full or in part to 17 out of 19 recommendations found in the OD Report

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<sup>32</sup> PG&E was ordered to produce the mobile app "as soon as practicable but within 10 months from the effective date of [the] decision. (Ordering Paragraph 1 (j))

and either has met or plans to meet these with full implementation.

The OD Report states “[o]ur findings illustrate that the app’s value is significant and worthy of development beyond the pilot. The app increases the scale of PG&E’s safety operations by empowering residents (who are familiar with their neighborhoods) to notice and report damaged equipment or potentially dangerous situations (40% of safety concerns were not previously known to PG&E). In 2022, the cost per safety submission was \$2,364, which is a reasonable expense compared to PG&E’s other preventative measures. If even one submission a year avoids an ignition event from a pole transformer, then the benefits from the app will outweigh the costs to maintain it. Moreover, the per report cost should decrease as the app is made available, downloaded, and used by more customers<sup>33</sup>.”

“Given that its costs including development were approximately \$6 million in its first two years compared to PG&E’s annual \$2-plus billion budget for wildfire prevention, PG&E Report It appears to be a modest incremental expense.”<sup>34</sup> “Considering the above findings, we conclude that PG&E Report It is cost-effectively delivering a critical benefit to PG&E customers and the State’s energy safety goals and should continue to be offered and expanded to other parts of the territory.” “We recommend that the PG&E Report It mobile app be elevated out of pilot status to become a permanent PG&E electric safety program. As a part of the transition, we recommend that PG&E make available the resources necessary to optimally expand the mobile app’s reach throughout PG&E’s electric service territory.”<sup>35</sup>

### **III. CONCLUSION**

For the reasons outlined above, PG&E kindly requests the Commission:

- 1) Move the Report It Mobile App program to a fully permanent status via Option 1 in PG&E’s Straw Proposal
- 2) Reject SPD’s recommendations for Conditions

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<sup>33</sup> OD Report p. 55

<sup>34</sup> OD Report p. 57

<sup>35</sup> OD Report p. 59

- 3) Allow for PG&E to recover cost through General Rate Case submissions
- 4) Refrain from adding metrics, reporting cadence/ new yearly reports and evaluation criteria to the mobile app reporting

Respectfully Submitted,

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Dated: June 18, 2024

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