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Decision 25-01-008 January 16, 2025

**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. (U39E).

Application 19-07-019

**DECISION ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY'S  
MOBILE APPLICATION AND SUPPORTING SYSTEMS PILOT**

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**DECISION ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY'S  
MOBILE APPLICATION AND SUPPORTING SYSTEMS PILOT**

**Summary**

This decision orders the continuation of Pacific Gas and Electric Company's (PG&E) mobile app as a pilot program funded entirely by PG&E's shareholders that is available for users to report all potential safety matters pertaining to PG&E's electric infrastructure throughout PG&E's service territory. PG&E shall not terminate the mobile app pilot program without Commission authorization. We approve PG&E's proposal to transition the pilot program from the current approach requiring the download of an app for either Apple or Android operating systems to an online approach. The decision also orders PG&E to file and serve quarterly and annual reports to assist the Commission in evaluating the mobile app's impact on safety and risk reduction, and it directs PG&E to continue to maintain an asset management database and make available to the public mobile app information that promotes transparency and safety.

This proceeding is closed.

**1. Background**

On July 29, 2019, Pacific Gas and Electric Company (PG&E) filed Application (A.) 19-07-019 for Approval of its Mobile Application and Supporting Systems Pilot (Application). The Application was filed in conformity with a Commission directive in the Order Instituting Investigation and Order to Show Cause (I.) 19-06-015, which concerned the maintenance and operation of PG&E's electric facilities that were involved in igniting fires in its service

territory in 2017. As part of I.19-06-015, the Commission directed PG&E to take certain corrective actions immediately, including filing this Application to seek Commission approval to develop a mobile application (mobile app) and supporting systems, at shareholder expense, to be used by the public to report compromised utility electric infrastructure.

The Application, as filed by PG&E, includes a request to first establish a pilot program. Then, if the Commission determines the mobile app to be reasonable and in the public interest, the Commission could require PG&E to implement the pilot permanently. The Commission in I.19-06-015 provided few details about the framework of the proposed mobile app and did not address the appropriateness of a pilot phase as a program component.

On August 28, 2019, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed the sole protest to the Application. Cal Advocates supported PG&E's intention to develop and deploy a pilot program for the mobile app prior to full deployment. However, Cal Advocates raised concerns in its protest regarding the service territory covered by the pilot program<sup>1</sup> and suggested the pilot include Tier 2 High Fire Threat Districts (HFTDs) in addition to the Tier 3 HFTDs proposed by PG&E. PG&E filed a reply to the Cal Advocates protest on September 9, 2019, arguing that expanding the pilot target area to include all of Tiers 2 and 3 HFTDs would "increase the percentage to over 99 percent of PG&E's total overhead assets in the HFTD locations," and that such a request was "misguided" and "arguably defeats the

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<sup>1</sup> Cal Advocates Protest at 2.

purpose of a pilot program.” Nevertheless, PG&E indicated “there could be benefits to include some portions of Tier 2 HFTD” and agreed to expand the scope of the pilot to also include some customers in the Tier 2 HFTDs pending consultation with Cal Advocates.<sup>2</sup>

The assigned Administrative Law Judge (ALJ) held a prehearing conference on October 15, 2019, to discuss the issues of law and fact and to determine the need for hearing and schedule for resolving the matter. The Assigned Commissioner issued the Scoping Memo and Ruling (Scoping Memo) on November 14, 2019. The scope of the proceeding, as set forth in the Scoping Memo, is as follows:

1. Whether a pilot mobile app complies with the directives in I.19-06-015?
2. Whether the parameters of the pilot are reasonable?
3. Whether the results of the pilot indicate that a mobile app can specifically improve public safety?
4. Whether the metrics and process for evaluating the effectiveness of the mobile app are reasonable?
5. Are there any other relevant safety considerations associated with the pilot?<sup>3</sup>

A public workshop was held at the Commission on December 3, 2019, at which PG&E presented renderings articulating the expected user experience for the future mobile app. PG&E filed its draft pilot implementation plan on January

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<sup>2</sup> PG&E Reply to Protest at 4.

<sup>3</sup> Scoping Memo at 4.

17, 2020, titled Mobile Application Pilot Implementation Report. On February 12, 2020, the Commission held a second public workshop. During this second workshop, PG&E, the California Department of Technology, and Professor Catherine Sandoval on behalf of the Broadband Institute of California (BBIC) at Santa Clara University School of Law made presentations. In addition, the Commission's Safety Policy Division (SPD) presented recommendations regarding PG&E's mobile app pilot at the second workshop. Those recommendations are set forth in SPD's Workshop 2 Report filed on May 8, 2020. The recommendations included, among other things, that the Commission direct PG&E to incorporate within the mobile app additional safety information-sharing capabilities to keep customers informed in an era of heightened wildfire threats and planned power shutoffs, such as Public Safety Power Shutoff (PSPS) alerts and a method to enable customers to report power outages.

On February 21, 2020, Cal Advocates and BBIC filed comments on PG&E's January 17, 2020 Mobile Application Pilot Implementation Report, and BBIC and PG&E filed reply comments on March 6, 2020. In response to these comments, PG&E made minor modifications to its pilot and filed a Revised Mobile Application Pilot Implementation Report on March 20, 2020. This revised implementation plan, similar to the initial January 17, 2020 plan, describes PG&E's suggested framework for the mobile app pilot.

In D.20-10-003 in this proceeding, as corrected in D.20-12-001 (collectively the 2020 Decision), the Commission approved PG&E's mobile app and supporting systems pilot with modifications, including orders that PG&E (1) expand the scope of the mobile app pilot to encompass all safety matters

pertaining to PG&E's electric infrastructure, (2) make available to the public all safety reports within 30 days of receipt with PG&E's determination and analysis, GPS coordinates, corrective action, review status, and photos, unless confidential under the law, (3) include all customers in Tier 2 and Tier 3 High Fire Threat Districts (HFTDs), (4) file and serve quarterly status reports on its activities and progress on the mobile app pilot, and (5) undertake an evaluation of the mobile app pilot with the retention of a qualified independent consultant to assess the feasibility, obstacles, and benefits for integrating the mobile app into PG&E's existing complaint intake system.<sup>4</sup> In addition, the 2020 Decision states that costs associated with the mobile app pilot shall be at PG&E shareholder expense.<sup>5</sup>

Pursuant to the 2020 Decision, PG&E developed the mobile app and made it publicly available in July 2021 under the branding name "Report It." PG&E contracted with third-party consultant Opinion Dynamics to evaluate and produce a written evaluation report regarding the mobile app.

On July 3, 2023, the assigned ALJ issued a ruling requesting party comments regarding Opinion Dynamics' June 30, 2023 Draft Evaluation Report (Draft Report) of the mobile app pilot and PG&E's response regarding the Draft Report's recommendations. No comments were submitted in response to the July 3, 2023, ruling. On September 29, 2023, PG&E filed a Straw Proposal outlining PG&E's preferences and options regarding the mobile app for the years 2023-2025 (PG&E Straw Proposal). On November 6, 2023, PG&E filed Opinion

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<sup>4</sup> D.20-12-001 at Ordering Paragraphs (OPs) 1-4.

<sup>5</sup> D.20-12-001 at OP 6.

Dynamics' Final Evaluation Report regarding the mobile app pilot (Final Evaluation Report) and PG&E's Response to the Final Evaluation Report's Recommendations (PG&E Response to Final Evaluation Report).

On June 4, 2024, the assigned ALJs issued a ruling requesting party comments and objections to the Commission's Safety Policy Division's Response to the PG&E Straw Proposal (SPD Response). PG&E filed comments regarding the SPD Response (PG&E Comments on SPD Response) on June 18, 2024.

On July 9, 2024, PG&E filed a motion to admit into evidence the documents identified in the motion as Exhibits PG&E-01 and PG&E-02. On July 24, 2024, the assigned ALJs issued a ruling admitting into evidence Exhibits PG&E-01, PG&E-02, the PG&E Straw Proposal, the Final Evaluation Report, the PG&E Response to Final Evaluation Report, the SPD Response, and the PG&E Comments on SPD Response.

### **1.1. Submission Date**

This matter was submitted on July 24, 2024, upon the filing of the ALJ Ruling Admitting Evidence into the Evidentiary Record.

## **2. Issues Before the Commission**

As framed by the evidentiary record, the issues to be addressed in this decision are:

1. Whether the mobile app should be discontinued, continued as a pilot program, or continued as a permanent program.
2. Whether the mobile app should have versions for Apple, Android, a web-based app, or some combination of those versions.
3. Whether mobile app costs should continue to be a PG&E shareholder expense, whether PG&E should be allowed to



seek recovery for mobile app costs from ratepayers, or whether there should be a deferral of a decision to allow PG&E to seek recovery for mobile app costs to a future proceeding.

4. Whether the frequency of PG&E's current quarterly reporting requirement should be modified.
  5. Whether PG&E should be required to include additional information in its reports to the Commission.
  6. Whether PG&E should be required to retain specified mobile app data and records.
  7. Whether any additional requirements should be imposed on PG&E.
- 3. Opinion Dynamics' Final Evaluation Report, PG&E Straw Proposal, and Safety Policy Division Response**

**3.1. Opinion Dynamics' Final Evaluation Report**

Opinion Dynamics conducted a third-party evaluation of the mobile app in two phases. Phase I included interviews of PG&E staff, a review of files in response to data requests, and an examination of PG&E's marketing, education, and outreach (ME&O) used to promote the mobile app to both residential customers and PG&E partners. Phase II consisted of research to understand the user experience and the mobile app's efficacy, including a user survey targeting individuals who had submitted at least one safety report using the mobile app, a second survey targeting residential customers who had received ME&O encouraging them to download and use the mobile app but who had not yet submitted a safety report, and in-depth interviews with users, most of them working directly for PG&E and all of them considering themselves responsible for safety, and an analysis of mobile app usage and cost data, including a

comparison of mobile app expenses to other PG&E wildfire prevention measures and a comparison of the mobile app's ME&O costs to PG&E's costs for the California Alternative Rates for Energy, Family Electric Rate Assistance, and Medical Baseline Allowance programs.<sup>6</sup>

Opinion Dynamics concluded that the mobile app is "effective at preventing wildfires and improving public safety," based upon the findings that more than 20 percent of the 653 submitted safety reports from July 2021 to mid-February 2023 raising safety issues not previously identified by PG&E were confirmed as clear and present ignition risks and that more than 40 percent of the mobile app submissions during that same time period constituted actual safety concerns. In addition, more than 75 percent of users were mostly or somewhat satisfied with the mobile app, and 86 percent of users plan to use the mobile app again. When users were dissatisfied, it was typically based on PG&E's response time and when PG&E's resolution did not meet the user's expectations.<sup>7</sup>

Applying the guidelines set forth in the 2020 Decision, Opinion Dynamics found that 67 percent of the mobile app safety reports were valid, with 30 percent of the invalid reports related to non-PG&E assets. 74 percent of 261 mobile app users who responded to a survey reported that they pay more attention now that they know to look for safety issues, indicating that the app influences customer behavior.<sup>8</sup> In its summary, Opinion Dynamics concluded

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<sup>6</sup> Final Evaluation Report at 6-7.

<sup>7</sup> Final Evaluation Report at 7, 45-46.

<sup>8</sup> Final Evaluation Report at 7-8, 20.

that the mobile app (1) has enabled users to alert PG&E to ignition risks and other safety hazards, (2) is a minor expense compared to PG&E's other costs for wildfire prevention, (3) encourages users to report safety concerns and to possibly look for them, (4) has high overall customer satisfaction, and (5) is used appropriately by most customers and stakeholders. Opinion Dynamics recommends that the mobile app be elevated out of pilot status to become a permanent PG&E electric safety program.<sup>9</sup> Opinion Dynamics also provided specific recommendations regarding ongoing management, programming and process, user behavior, and ME&O.<sup>10</sup>

### **3.2. PG&E Straw Proposal**

PG&E's September 29, 2023 mobile app straw proposal presents "its preliminary proposal outlining its preferences and options for the near to mid-term future (2023-2025) of the program."<sup>11</sup> PG&E proposes transitioning the mobile app to a mobile-friendly web page, asserting that a web page "offers significant cost savings, eliminates app downloads and device requirements, and reduces maintenance needs."<sup>12</sup> PG&E also proposes to transfer the mobile app from a pilot to a permanent program and focus marketing it toward customers in Tier 2 and Tier 3 High Fire Threat Districts.<sup>13</sup> PG&E states that it intends to submit annual reports to the Commission that "will encompass essential

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<sup>9</sup> Final Evaluation Report at 8.

<sup>10</sup> Final Evaluation Report at 9-10.

<sup>11</sup> PG&E Straw Proposal at 1.

<sup>12</sup> PG&E Straw Proposal at 1.

<sup>13</sup> PG&E Straw Proposal at 3.

program enhancements, encountered challenges, and pertinent statistics linked to the operation of the application.” PG&E also “will seek cost recovery for the Report It application for the continuance of the app in either the web based format or the app format to the extent the CPUC orders continuance beyond the pilot phase of this program....”<sup>14</sup> PG&E intends to seek cost recovery via a general rate case for costs associated with the continuation of the mobile app.<sup>15</sup>

In the straw proposal, PG&E presents three options regarding the future of the mobile app program. Option 1 is the replacement of the mobile application with a web-based version at an estimated program cost of \$3.4 million in 2024 and \$3.7 million in 2025. PG&E recommends this option “because of its proven effectiveness and value for our customers.”<sup>16</sup> Option 2 is the continuation of the mobile app in its current state with estimated program costs of \$4.2 million in 2024 and \$4.2 million in 2025. Option 3 is the continuation of the current version and the development of a web-based version (a combination of Options 1 and 2) with estimated program costs of \$6.75 million in 2024 and \$5.55 million in 2025.

### **3.3. Safety Policy Division Response**

The Commission’s Safety Policy Division provided a written SPD Response to the Final Evaluation Report and the PG&E Straw Proposal that was filed as an attachment to an ALJ ruling in this proceeding on June 4, 2024. Regarding the recategorization of the mobile app as a permanent program, the SPD Response states: “Staff is unable to support a recommendation to change the

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<sup>14</sup> PG&E Straw Proposal at 5.

<sup>15</sup> PG&E Straw Proposal at footnote 1.

<sup>16</sup> PG&E Straw Proposal at 6-7.

Mobile App status to permanent at this time. The Consultant's evaluation Report does not make the necessary evaluations of the Mobile App to enable Staff to make a conclusion about the safety benefits of the Mobile App. Staff does not find that the Consultant Report contains sufficient evidence to assess the core function of the app – its ability to positively impact PG&E's safety record."<sup>17</sup>

The SPD Response supports modification of the existing mobile app from two downloadable apps serving Apple and Android smartphones to a single web-based approach that can be accessed by any internet-enabled device and remove the need to have ongoing software updates for changes made to smartphone operating systems.<sup>18</sup> Regarding the three options for continuation of the mobile app presented in the PG&E Straw Proposal, SPD found that the advantages of the web-based version identified as Option 1 in PG&E's Straw Proposal are "clear and compelling. Option 1 does more (with less cost) to further the initiative's reach and accessibility. It also promises to increase the functionality of the Mobile App by way of leveraging the web-based app's promised compatibility with existing PG&E online consumer resources."<sup>19</sup>

The SPD Response sets forth a list of proposed stipulations and conditions for PG&E to meet regarding the continuation of the mobile app.<sup>20</sup> We address the most salient SPD recommendations in the Discussion section of this decision below. The SPD Response also addresses the Final Evaluation Report of

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<sup>17</sup> SPD Response at 4.

<sup>18</sup> SPD Response at 5.

<sup>19</sup> SPD Response at 9.

<sup>20</sup> SPD Response at 13-15.

consultant Opinion Dynamics, stating that the report's findings, conclusions, and recommendations "are useful and facilitate improved understanding of the working of and public perception to the Mobile App" but that the report "lacks sufficient detail to adequately inform Staff's ability to discern the merits of the Mobile App from a safety perspective."<sup>21</sup>

#### **4. Discussion**

##### **4.1. Mobile App Continuation as a Pilot Program**

In the 2020 Decision approving the mobile app pilot in this proceeding, the Commission did not set a termination date for the pilot program. Instead, we set a minimum pilot duration of 24 months from the launch date of the pilot, with the first 12 months for testing in all seasons, including one full wildfire season, and the second 12 months for evaluation recommendations for improvement as the pilot continues to operate.<sup>22</sup> The decision further provides for Commission consideration of the recommendations to "provide a basis for the Commission to establish a permanent program, if warranted....To be clear, PG&E should not halt the pilot in the absence of Commission authorization."<sup>23</sup>

The Final Evaluation Report prepared by Opinion Dynamics recommends that the mobile app "become a permanent PG&E electric safety program"<sup>24</sup> because it (1) has enabled users to alert PG&E to ignition risks and other safety hazards, (2) is a minor expense compared to PG&E's other costs for wildfire

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<sup>21</sup> SPD Response at 16.

<sup>22</sup> D.20-10-003 at 28.

<sup>23</sup> D.20-10-003 at 28-29.

<sup>24</sup> Final Evaluation Report at 8.

prevention, (3) encourages users to report safety concerns (and to possibly look for them), (4) has high overall customer satisfaction, and (5) is used appropriately by most customers and stakeholders.<sup>25</sup>

In its straw proposal, PG&E proposes the transformation of the mobile app pilot into a permanent program.<sup>26</sup> PG&E states that it intends to maintain open access to the app for all electric customers with a focus on customers in High Fire Threat Districts (HFTD).<sup>27</sup> According to PG&E:

The pilot program has exceeded expectations in supporting PG&E's stand that catastrophic wildfires shall stop. PG&E views this Report It application as an important component in the multi-pronged strategy to reducing ignition risk, prompting PG&E to continue the pilot without substantial alterations to ensure PG&E focuses program and marketing resources in the areas of greatest ignition risk.... PG&E will resource the Report It mobile application program as a permanent program and continue marketing it toward customers in Tier 2 and Tier 3 HFTD.<sup>28</sup>

PG&E further states:

The Report It application has proven its utility to our customers, with approximately 80% of users expressing a likelihood to utilize the application in the future. This application serves as a valuable platform for customers to report safety concerns and remain informed about the resolution of their submissions. To capitalize on the achievements of the pilot phase and unlock the full potential

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<sup>25</sup> Final Evaluation Report at 8.

<sup>26</sup> PG&E Straw Proposal at 2.

<sup>27</sup> PG&E Straw Proposal at 3.

<sup>28</sup> PG&E Straw Proposal at 3.

of a permanent program, it becomes imperative to implement additional improvements, allocate resources for staffing, and expand supporting infrastructure. PG&E will seek cost recovery for the Report It application for the continuance of the app in either the web based format or app format to the extent the CPUC orders continuance beyond the pilot phase of this program, in accordance with the CPUC guidance under I.19-06-015.<sup>29</sup>

In its response to the PG&E Straw Proposal, SPD addressed whether the mobile app should remain a pilot program or become permanent as follows:

Although [Opinion Dynamics] supports continuation and recategorization of the Mobile App as a permanent program, Staff is unable to support a recommendation to change the Mobile App status to permanent at this time. The [Final Evaluation Report] does not make the necessary evaluations of the Mobile App to enable Staff to make a conclusion about the safety benefits of the Mobile App. Staff does not find that the [Final Evaluation Report] contains sufficient evidence to assess the core function of the app – its ability to positively impact PG&E’s safety record. Staff recommends that PG&E continue the existing Pilot program as it is now scoped but with additional regulatory reporting and data preservation provisions to further compile vital safety impact data and provide for future Mobile App program assessment and/or evaluation.<sup>30</sup>

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<sup>29</sup> PG&E Straw Proposal at 5.

<sup>30</sup> SPD Response at 4-5.



Although SPD sees “potential meaningful safety improvement and risk reduction resulting from the existence of the Mobile App,”<sup>31</sup> SPD believes that the mobile app’s impact on safety has been inconclusive:

- There was an absence of measurable data to inform any resulting favorable safety impacts. Unanswered questions that remain include:
- Were critical safety issues brought to light that may not have been identified otherwise, or addressed as rapidly without the Mobile App? and
- 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?
- For these reasons of incomplete, inconclusive, and less than compelling data and findings surrounding tangible safety impact benefits captured by the Mobile App initiative, staff at this time is unable to support recategorizing the pilot to permanent program status.<sup>32</sup>

In its comments regarding the SPD Response, PG&E disagrees with SPD’s conclusion that the data regarding tangible safety benefits of the mobile app was inconclusive. PG&E noted that 40 percent of the unique submissions made through the mobile app raised valid safety concerns not previously identified by PG&E.<sup>33</sup> PG&E also claimed that on average cases were reported 21 months before the next scheduled inspection, proving “the efficacy of the program to find issues more rapidly and/or unknown to PG&E based on geographic location

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<sup>31</sup> SPD Response at 12.

<sup>32</sup> SPD Response at 11.

<sup>33</sup> PG&E Comments on SPD Response at 8.

when compared to the inspection timeline cycle.<sup>34</sup> However, PG&E acknowledges that the Final Evaluation Report “was not able to evaluate the avoided costs of wildfires because of the uncertainty of the likelihood and scale of the avoided fires....”<sup>35</sup>

The data referenced in the Final Evaluation Report does reflect that the mobile app has provided an additional and useful means for reporting safety concerns to PG&E and for PG&E to address them, possibly in a more rapid timeframe than would have been the case without the mobile app. However, we agree with SPD that the evidentiary record is sparse regarding the specific tangible benefits of the mobile app regarding safety, particularly the reduction in wildfire ignition risk. A showing that the mobile app has resulted in reports raising safety concerns is not sufficient in and of itself to merit the immediate transition of the mobile app pilot program to permanent program status. In Section 4.4 of this decision, we identify the additional data collection and reporting requirements to be undertaken by PG&E that will better inform the Commission’s evaluation of the efficacy of the mobile app program, including future re-consideration whether the mobile app program should be made permanent. In deciding not to grant permanent status to the mobile app, we do not preclude PG&E from seeking permanent status through a future request to the Commission.

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<sup>34</sup> PG&E Comments on SPD Response at 8.

<sup>35</sup> PG&E Comments on SPD Response at 9.

#### **4.2. Mobile App Transition to a Web-Based Version**

As set forth above, PG&E has presented three options for the continuation of the mobile app: Option 1 proposes a change to a web-based version of the app, Option 2 proposes a continuation of the current approach with downloadable versions of the mobile app available to Apple and Android users, and Option 3 includes both the web-based and current mobile app versions set forth in Options 1 and 2. There is merit to each of the three options. Option 3 provides the most flexibility by allowing a user the choice to either download and use the app corresponding to their preferred smartphone operating system or to go online and submit a report to a PG&E website portal. However, that flexibility comes at a price: PG&E estimates that Option 3 would have total program costs for 2024 and 2025 of \$12.3 million, \$5.2 million or 73 percent more than Option 1's total estimated costs of \$7.1 million for those years. Although we determine in this decision that mobile app costs will continue to be a PG&E shareholder expense, PG&E has stated that it may seek ratepayer cost recovery in a future general rate case. Regardless of the funding source for mobile app costs, it is appropriate for the Commission to consider and compare the costs of the proposed options as a factor in deciding which option is preferable.

Option 2, the continuation of the current mobile app offering for Apple and Android smartphones, has the benefit of having a "track record," which arguably will provide an easier pathway for those users who are familiar with the app through previous submissions. As SPD notes, Option 2 "minimizes program disruption from a consumer perspective by preserving the existing Mobile App consumer-delivery vehicle of independent Android and Apple

downloadable apps.”<sup>36</sup> However, SPD cites to the fact that almost 90 percent of the combined usage from the two apps is from Apple-based operating systems<sup>37</sup> and that the Option 1 web-based platform does more (with less cost) to further the program’s reach and accessibility.<sup>38</sup> The evidence supports the conclusion that the current protocol, which requires the affirmative action of downloading an app, could be a barrier to mobile app use for at least some potential users.

Both PG&E and SPD point to PG&E’s familiarity with customer interaction through its current online presence as a reason to recommend Option 1’s web-based approach. PG&E favors a move to a mobile-friendly web page because of its proven effectiveness and value to its customers,<sup>39</sup> and SPD notes that an online approach would increase the mobile app’s functionality by leveraging it with PG&E’s existing online consumer resources.<sup>40</sup>

Although not as large as the cost difference between Options 1 and 3, PG&E has estimated that Option 1’s 2024 and 2025 total costs will be \$1.3 million less than Option 2’s. In addition, no evidence has been submitted disputing PG&E’s estimates or arguing against PG&E’s and SPD’s Option 1 recommendation. After full review of the evidentiary record, including the equitable considerations described above, we find PG&E’s proposal to transition the mobile app to a web-based format to be reasonable and approve it. PG&E

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<sup>36</sup> SPD Response at 10.

<sup>37</sup> SPD Response at 10.

<sup>38</sup> SPD Response at 9.

<sup>39</sup> PG&E Straw Proposal at 7.

<sup>40</sup> SPD Response at 9.

shall implement the transition to a web-based approach as soon as reasonably practicable.

#### **4.3. Mobile App Costs Continuation as PG&E Shareholder Expense**

In the Order Instituting Investigation regarding the role of PG&E's electrical facilities in igniting fires in its service territory in 2017, the Commission ordered PG&E to develop a mobile app and supporting system, and that the "costs to develop and operate the mobile app and asset management system/database will be at shareholder expense.<sup>41</sup>" In the decision in this proceeding approving PG&E's mobile app pilot program, the Commission reiterated the directive that the costs associated with the development and continued operation of the mobile app pilot and supporting systems remain at shareholder expense, including costs related to the evaluation of the pilot and costs related to outreach and training.<sup>42</sup> That decision also stated that the Commission will revisit that directive and consider whether "continued operation of this mobile app and supporting systems, if permanently implemented, would be more appropriately categorized as a ratepayer expense (emphasis added)."<sup>43</sup>

In its straw proposal, PG&E proposes to make the mobile app a permanent program<sup>44</sup> and that, to "capitalize on the achievements of the pilot phase and

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<sup>41</sup> I.19-06-015 at OP 13.

<sup>42</sup> D.20-10-003 at 17-18; D.20-12-001 at OP 6.

<sup>43</sup> D.20-10-003 at 18.

<sup>44</sup> PG&E Straw Proposal at 2-3.

unlock the full potential of a permanent program, it becomes imperative to implement additional improvements.”<sup>45</sup> PG&E states that it will seek recovery for the mobile app “to the extent the CPUC orders continuance beyond the pilot phase of this program”<sup>46</sup> and that “PG&E intends to seek cost recovery via a general rate case for costs associated with the continuation of a mobile app, either web or app based, beyond the pilot phase of this program.”<sup>47</sup>

In its response, SPD recommends that PG&E not be eligible to seek cost recovery in a future general rate case or other application for expenses incurred in the establishment and administration of the mobile app unless PG&E collects, records, and reports “sufficient data” regarding the issues (1) whether critical safety issues were brought to light that may not have been identified otherwise or addressed as rapidly without 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.<sup>48</sup>

In Section 4.1 above, we found that the mobile app should continue as a pilot program and not be made permanent at this time. Consistent with our earlier decision D.20-10-003 in this proceeding to consider whether the continued operation of the mobile app should be considered a ratepayer expense only if the program is permanently implemented, it remains premature to determine whether PG&E should be allowed cost recovery. That position aligns with

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<sup>45</sup> PG&E Straw Proposal at 5.

<sup>46</sup> PG&E Straw Proposal at 5.

<sup>47</sup> PG&E Straw Proposal at footnote 1.

<sup>48</sup> SPD Response at 13-14.

PG&E's expressed position that it will seek cost recovery for costs "beyond" the pilot phase of the program.

We address below whether PG&E's current mobile app reporting requirements should continue and whether additional requirements should be imposed. We expect PG&E to fully comply with all requirements set forth in this decision. However, we cannot anticipate every circumstance that may be considered in deciding whether in the future mobile app funding should shift from PG&E's shareholders to ratepayers. As a result, this decision extends the directive in the 2020 Decision that the costs associated with the development and continued operation of the mobile app pilot and supporting systems remain at shareholder expense, and we decline in this decision to impose conditions or requirements that PG&E must satisfy in order to submit a future request for mobile app cost recovery.

#### **4.4. PG&E Quarterly and Annual Reporting Requirements**

The 2020 Decision ordered PG&E to file and serve quarterly status reports on PG&E's activities and progress regarding the mobile app pilot, with that directive expiring at the end of the pilot.<sup>49</sup> As reflected in the Docket Card in this proceeding, PG&E has submitted the quarterly status reports required by the 2020 Decision. In its straw proposal, PG&E states that it intends to submit annual reports "to ensure the CPUC Commission is comprehensively apprised of all Report It application program-related developments."<sup>50</sup>

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<sup>49</sup> D.20-12-001 at OP 2.

<sup>50</sup> PG&E Straw Proposal at 5.

Rather than eliminating the quarterly reports, the Commission's Safety Policy Division proposes expanding PG&E's existing requirements to include both quarterly and annual reports. For the quarterly reports, SPD recommends that (1) PG&E record and report data regarding (a) whether critical safety issues were brought to light that may not have been identified or addressed as rapidly without the mobile app, (b) what share of non-safety reports submitted through the mobile app interfered with PG&E's ability to address legitimate safety concerns, (2) for safety complaints submitted through the mobile app regarding poles and energized overhead wires that are not resolved within nine months of the submittal date, PG&E should provide (a) a description of, location, and submittal date of each incident and (b) the number of days that the mobile app report has remained open. In addition, SPD proposes that PG&E be required to provide the following in annual reports to the Commission:

- Detailing, tracking, and trending PG&E staff time expended or diverted by invalid, 911-level, or non-safety issue reports with analysis to offer proposed solutions or remedial suggested actions.
- For poles and energized overhead wires, PG&E is to characterize and quantify response and resolution times for reports submitted through the mobile app against average times to address similar issues in similar geographies reported to PG&E's call center.
- For poles and energized overhead wires, detailing, tracking, and trending safety reports submitted through the mobile app that remain unresolved nine months or more after the date the user submitted a safety report, including year over year performance tracking of such



unresolved reports. PG&E shall provide the following minimum information for each such safety report:

- Description and location of incident and submittal date;
- Number of days the report has remained open;
- Time taken to process the complaint and make a field inspection assignment;
- Time taken to make an initial field inspection;
- Time taken to make a determination of safety hazard and course of action;
- Initial estimated date for resolution, including repair or replacement;
- As applicable, subsequent estimated date for resolution, including repair or replacement, with tally of number of times a resolution date was rescheduled, and days elapsed from date of initial complaint to actual resolution<sup>51</sup>.

In its comments to SPD's Response, PG&E takes issue with SPD's focus on mobile app safety reports unresolved for nine months or more as beyond the scope of the 2020 Decision, unsupported legally, duplicative, and in conflict with General Order (GO) 95 Rule 18(A).<sup>52</sup> PG&E states that requiring separate tracking and reporting of safety issues reported through the mobile app "would be a waste of time, money, and resources, but most importantly, would not expose a

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<sup>51</sup> SPD Response at 14-15.

<sup>52</sup> GO 95 sets forth requirements for overhead line design, construction, and maintenance applicable to electrical supply and communication facilities located outside of buildings. GO 95 Rules 11, 12. Under GO 95 Rule 18(A), each electric utility is responsible for taking appropriate corrective action to remedy safety hazards posed by its facilities. GO 95 Rule 18(B) requires electric utilities to establish and implement maintenance programs for its lines and facilities to ensure they are in good condition.

problem since Rule 18 does not define resolving safety issues after 9 months as delinquent.”<sup>53</sup>

PG&E also asserts that SPD’s quarterly reporting recommendations have been adequately covered in the Final Evaluation Report and PG&E’s current quarterly reports and that additional reporting requirements regarding invalid submissions are unnecessary or impractical.<sup>54</sup> PG&E also claims that SPD’s recommendation to require PG&E to provide quarterly abbreviated reports regarding safety submissions open for more than nine months “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 issues found at GO 95 Rule 18....”<sup>55</sup>

As reflected in Section 4.1 above, we find that additional information is needed to properly determine the impact of the mobile app on risk mitigation. Contrary to PG&E’s assertion, we do not find that the evidentiary record, including the Final Evaluation Report, adequately addresses the impact of the mobile app on safety. PG&E states that it is willing to provide annual mobile app reports. However, it does not contend or provide facts demonstrating that its quarterly status reports are unduly burdensome. To develop the record and

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<sup>53</sup> PG&E Comments to SPD Response at 6.

<sup>54</sup> PG&E Comments to SPD Response at 11-13.

<sup>55</sup> PG&E Comments to SPD Response at 14-15.

thereby provide a sound basis for properly evaluating the mobile app, we find that PG&E must continue to provide quarterly status reports on mobile app activities and progress including, at a minimum, the information set forth in the ordering paragraphs of this decision.

Regarding the additional reporting requirements recommended by SPD, PG&E mischaracterizes SPD's proposal by claiming that it requires PG&E to close out safety complaints within nine months regardless of priority. SPD does not propose to modify the priority levels and resolution times set forth in GO 95 Rule 18; instead, SPD's proposal only identifies the areas to be covered in reports to the Commission. GO 95 does not purport to restrict the Commission's judgment in requiring an electric utility, such as PG&E, to submit reports reasonably calculated to assist the Commission to evaluate safety. A requirement to submit information regarding mobile app safety complaints unresolved after nine months will be useful in gauging both PG&E's responsiveness to safety complaints submitted through the mobile app and the overall level of safety concern raised by the mobile app complaints.

To better evaluate the mobile app's effectiveness in risk reduction, we also find it reasonable to require PG&E to provide information comparing the response and resolution times of non-emergency safety issues submitted through mobile app reports with non-emergency safety issues reported to PG&E's telephone call center.

#### **4.5. PG&E Retention of Mobile App Data and Records**

In addition to directing PG&E to develop a mobile app, I.19-06-015 directed PG&E to maintain an asset management database to include all photos

received through the mobile app “so that the photos of potential problems are accessible to the general public.”<sup>56</sup> In the 2020 Decision in this proceeding, the Commission stated that publicly posting photos and related information obtained through the mobile app “will promote transparency, enforcement of the Commission’s rules, and safety generally.”<sup>57</sup> In that decision, the Commission approved PG&E’s proposal to store in the asset management database the following information for valid submissions through the mobile app: (1) whether the photo identifies a problem; (2) whether the problem presents a safety concern or is a violation of safety regulations; (3) PG&E actions to remedy the matter; and (4) when the remedial action was or will be taken.<sup>58</sup> In addition, the Commission directed PG&E, within 30 days of its receipt of a safety report through the mobile app, to upload information received to the asset management database and make available to the public the safety report, PG&E’s determination and analysis, GPS coordinates, corrective action, review status, and photos, unless confidential under the law.<sup>59</sup> The 2020 Decision also required PG&E to preserve all data submitted via the mobile app deemed invalid or rejected, including emergency matters, for four years from the launch date of the mobile app pilot for

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<sup>56</sup> I.19-06-015 at 18.

<sup>57</sup> D.20-10-003 at 23.

<sup>58</sup> D.20-10-003 at 21.

<sup>59</sup> D.20-12-001 at OP 1(d), (f).

Commission evaluation unless a longer preservation time was required by law.<sup>60</sup>

PG&E states that it launched the mobile app pilot on July 28, 2021.<sup>61</sup>

The Commission's SPD recommends that "PG&E continue to preserve pertinent program records and data beyond the approaching four-year expiration date, until further notice."<sup>62</sup>

This decision orders that the mobile app continue as a pilot program and not be made permanent at this time. As the pilot phase continues, additional data is necessary for PG&E to analyze the effectiveness of this safety program. PG&E needs to collect a large enough sample of reliable data to more accurately track the evolution of the program's safety efforts and its impact on the community. Further, the Commission's policy objective guiding both the order initiating I.19-06-015 and the 2020 Decision to provide transparency through full public access to data resulting from reports submitted through the mobile app, an objective firmly based in maintaining safe and reliable service, continues to apply. In addition to retaining and making available to the public photos and information related to valid reports, extending the retention of invalid or rejected data submitted through the mobile app for an additional four years will assist the Commission in assessing the effectiveness of the entire program. As a result, we order PG&E to continue to maintain the asset management database and make available to the public all information as set forth in the 2020 Decision, and we

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<sup>60</sup> D.20-12-001 at OP 1(e).

<sup>61</sup> PG&E Straw Proposal at 1.

<sup>62</sup> SPD Response to PG&E Straw Proposal at 14.

require PG&E to preserve all data submitted via the mobile app deemed invalid or rejected, including emergency matters, for four years from the date of this decision for Commission evaluation unless a longer preservation time is required by law.

#### **4.6. Mobile App Use to Report All Safety Matters Pertaining to PG&E Electric Infrastructure**

The 2020 Decision states that the mobile app pilot “shall not be limited to issues related to reducing the risk of catastrophic wildfire. Rather, PG&E’s pilot shall encompass all potential safety matters pertaining to the utility’s electric infrastructure.”<sup>63</sup> Neither PG&E nor SPD has proposed any alteration to the scope of the mobile app as reflected in the 2020 Decision. Therefore, the mobile app pilot shall continue to be available for users to report all potential safety matters pertaining to PG&E’s electric infrastructure throughout PG&E’s service territory.

#### **4.7. Commission Authorization to Halt Mobile App Pilot**

The 2020 Decision provides that “PG&E should not halt the pilot in the absence of Commission authorization.”<sup>64</sup> Given that this decision extends the pilot status of the mobile app to further evaluate its impact on safety, it is important that PG&E maintain the mobile app until such time that the Commission has sufficient data to determine whether the program should become permanent or should end. Therefore, we continue the direction of the 2020 Decision that PG&E not halt the pilot in the absence of Commission

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<sup>63</sup> D.20-10-003 at 30.

<sup>64</sup> D.20-10-003 at 29.

authorization. Because this decision closes this proceeding, PG&E may seek to change the status of the mobile app pilot as part of a general rate case proceeding or in a separate application.

## **5. Summary of Public Comment**

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding. As of December 11, 2024, there were no public comments posted to the Docket Card for A.19-07-019.

## **6. Comments on Proposed Decision**

The proposed decision of ALJs KieuChinh Tran and Peter Wercinski in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission’s Rules of Practice and Procedure. Comments were filed on January 2, 2025, by PG&E.

In its comments on the proposed decision, PG&E requests the deletion of the Ordering Paragraph 4.b.(i) requirement that it provide an annual analysis of PG&E staff time expended by invalid mobile app pilot reports, asserting that PG&E does not currently track staff time and that it is unreasonable that PG&E implement a new process and software system to capture this data.<sup>65</sup> After review, we have deleted this requirement.

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<sup>65</sup> PG&E Comments on Proposed Decision at 1-2.

In addition, PG&E requests the deletion of the Ordering Paragraph 4.b.(ii) requirement that it provide an annual analysis comparing response and resolution times for mobile app reports against average times to address similar issues in similar geographies reported to PG&E's call center. PG&E argues against a comparison of mobile app reports with call center reports because the call center is meant to receive emergency calls and the mobile app's purpose is to address non-emergency potential safety issues.<sup>66</sup> Although PG&E states that "call center staff treat every call as an emergency and send an immediate response to the location, regardless of any particular facts,"<sup>67</sup> PG&E does not argue, and the evidentiary record in this proceeding does not reflect, that every telephone call to the PG&E call center is an emergency. A comparison of non-emergency safety issues submitted through mobile app reports with non-emergency safety issues reported to PG&E's telephone call center will be useful in our evaluation of the mobile app's effectiveness in risk reduction. As a result, we revise the proposed decision to require PG&E to provide an annual analysis that compares response and resolution times for non-emergency safety issues submitted through mobile app reports with non-emergency safety issues reported to PG&E's telephone call center.

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<sup>66</sup> PG&E Comments on Proposed Decision at 2-3.

<sup>67</sup> PG&E Comments on Proposed Decision at 3.



## **7. Assignment of Proceeding**

Karen Douglas is the assigned Commissioner and KieuChinh Tran and Peter Wercinski are the assigned ALJs in this proceeding.

### **Findings of Fact**

1. Although the mobile app has provided an additional and useful means for reporting safety concerns to PG&E and for PG&E to address them, the evidentiary record is inconclusive about the specific, tangible safety benefits of the mobile app.

2. PG&E's proposed option to transition the mobile app pilot program to an online version is estimated to cost \$7.1 million in 2024 and 2025, \$1.3 million and \$5.2 million less than the other two proposed options for the pilot program.

3. Almost 90 percent of the combined usage from the two current mobile apps is from Apple-based operating systems.

4. A web-based approach for reporting safety concerns that can be accessed by any internet-enabled device will promote user access and remove the need to have ongoing software updates for changes made to smartphone operating systems.

5. PG&E's current mobile app, which requires the downloading of an app, could be a barrier to mobile app use for some potential users.

6. An online approach for the pilot program would increase the program's functionality by leveraging it with PG&E's existing online consumer resources.

7. In I.19-06-015 that ordered PG&E to file the application that initiated this proceeding and in the 2020 Decision in this proceeding, the Commission ordered

that the costs associated with the development and operation of the mobile app and supporting systems shall be at PG&E shareholder expense.

8. A requirement to submit information regarding mobile app safety complaints unresolved after nine months will be useful in gauging both PG&E's responsiveness to safety complaints submitted through the mobile app and the overall level of safety concern raised by the mobile app safety complaints.

9. PG&E's tracking and report of invalid, non-safety complaints submitted through the mobile app will provide useful information on the effectiveness of the mobile app in generating the types of complaints that could result in improvements to safety and risk reduction.

10. PG&E's retention and making available to the public photos and information related to the mobile app provides transparency and supports the objective of having PG&E provide and maintain safe and reliable service.

11. Extending the retention of invalid or rejected data for an additional four years will assist the Commission in assessing the effectiveness of the entire mobile app program.

12. Neither the SPD nor any party has proposed any alteration to the mobile app's current availability for users to report all potential safety matters pertaining to PG&E's electric infrastructure throughout PG&E's service territory.

### **Conclusions of Law**

1. Because the evidentiary record is inconclusive about the specific, tangible safety benefits of the mobile app, the mobile app should remain a pilot program and not be granted permanent program status at this time.

2. PG&E's proposal to transition the mobile app pilot program to an online version is equitable and reasonable because it promotes user access and should be approved.

3. Because the mobile app should continue as a pilot program and not be made permanent at this time, it remains premature to determine whether PG&E should be allowed mobile app cost recovery.

4. PG&E's costs associated with the development and operation of the mobile app and supporting systems should continue to be at PG&E shareholder expense.

5. GO 95 does not restrict the Commission from requiring an electric utility to submit reports reasonably calculated to assist the Commission to evaluate safety.

6. To better evaluate the mobile app's effectiveness in risk reduction, it is reasonable to require PG&E to provide information comparing the response and resolution times of non-emergency safety issues submitted through mobile app reports against average times to address non-emergency safety issues reported to PG&E's telephone call center.

7. It is reasonable for the Commission to continue to require PG&E to provide quarterly status reports on PG&E's activities and progress regarding the mobile app pilot because such reports are relevant to the Commission's determination of the effectiveness of the mobile app program and there has been no showing that such reports will be unduly burdensome to PG&E.

8. It is reasonable for the Commission to adopt additional mobile app pilot reporting requirements that will assist the Commission in evaluating the impact of the mobile app on safety and risk reduction, including recommendations by

SPD to require PG&E to provide information comparing the response and resolution times of non-emergency safety issues submitted through mobile app reports against average times to address non-emergency safety issues reported to PG&E's telephone call center, and safety complaints regarding poles and energized overhead wires not resolved within nine months of the submittal date.

9. It is reasonable to require PG&E to continue to maintain the mobile app asset management database, continue to make available to the public mobile app information as set forth in the 2020 Decision, and require PG&E to preserve all data submitted via the mobile app deemed invalid or rejected for four years from the date of this decision unless a longer preservation time is required by law.

10. It is reasonable for the mobile app pilot to continue to be available for users to report all potential safety matters pertaining to PG&E's electric infrastructure throughout PG&E's service territory.

11. Because this decision extends the pilot status of the mobile app to further evaluate its impact on safety, it is reasonable to continue the direction of the 2020 Decision that PG&E not terminate the pilot without Commission authorization.

12. This proceeding should be closed.

## **O R D E R**

**IT IS ORDERED** that:

1. Pacific Gas and Electric Company's (PG&E) mobile app shall continue as a pilot program that is available for users to report all potential safety matters pertaining to PG&E's electric infrastructure throughout PG&E's service territory, and PG&E shall not terminate the mobile app pilot program without Commission authorization.

2. Pacific Gas and Electric Company's (PG&E) proposal to transition the mobile app pilot program to an online version is approved. PG&E shall implement the transition of the mobile app pilot program to an online version as soon as reasonably practicable.

3. Pacific Gas and Electric Company's (PG&E) costs associated with the development and operation of the mobile app and supporting systems shall continue to be at PG&E shareholder expense.

4. Pacific Gas and Electric Company shall file and serve on the service list of this proceeding the following mobile app pilot reports:

- a. Quarterly status reports covering its activities and progress including, at a minimum, the following information:
  - (i) For mobile app submissions made during the quarter covered by the report, the number of total submissions, valid submissions, invalid submissions, submissions not yet determined to be valid or invalid, corrective actions initiated, average days from submission to corrective action initiation, corrective actions completed, and average days from submission to corrective action completion. For valid submissions, the number identified as a safety concern or violation of a safety regulation and the numbers categorized by type of issue (e.g., Tree or Vine, Power Pole, Power Line, PG&E Equipment, Other), the number identified as no problem found, the number previously identified by PG&E through previous mobile app submissions, and the number previously identified by PG&E other than through previous mobile app submissions. For invalid submissions, the numbers categorized by type of issue (e.g., Third Party Equipment, Emergencies, Gas, Wood Management, Outages, Other);

- (ii) For mobile app submissions made but not fully resolved during a previous quarter, all of the information required in (i) above and, for such submissions still not fully resolved at the end of the reporting quarter, the numbers categorized by type of issue and the average days from submission to the end of the reporting quarter; and
- (iii) For safety complaints regarding poles and energized overhead wires that are not resolved within nine months of the submittal date, a description of, location, and submittal date of each such complaint and the number of days that the mobile app report has remained open.

Each quarterly report shall be filed and served no later than the first business day that is on or after 45 calendar days following the end of the quarter covered by the report.

b. Annual reports including, at a minimum, the following information:

- (i) For poles and energized overhead wires, analysis that characterizes and quantifies response and resolution times for non-emergency safety issues submitted through mobile app reports against average times to address non-emergency safety issues reported to PG&E's telephone call center; and
- (ii) For each mobile app pilot report regarding poles or energized overhead wires unresolved nine months after submittal:
  - Description and location of incident and submittal date;
  - Number of days the report has remained open;
  - Time taken to process the complaint and make a field inspection assignment;

- Time taken to make an initial field inspection;
- Time taken to make a determination of safety hazard and course of action;
- Initial estimated date for resolution, including repair or replacement;
- As applicable, subsequent estimated date for resolution, including repair or replacement, with tally of number of times a resolution date was rescheduled, and days elapsed from date of initial complaint to actual resolution.

Each annual report shall be filed and served no later than the first business day that is on or after May 15 following the end of the calendar year covered by the report.

5. Within 30 days of its receipt of a valid report through the mobile app, Pacific Gas and Electric Company (PG&E) shall upload to the mobile app asset management database and make available to the public the report, PG&E's determination and analysis, Global Positional System coordinates, PG&E's corrective action to remedy the matter, when the remedial action was or will be taken, review status, all photos, whether each photo identifies a problem, and whether an identified problem presents a safety concern or violates a safety regulation, unless such information is confidential under the law.

6. Pacific Gas and Electric Company shall preserve all data submitted via the mobile app deemed invalid or rejected, including emergency matters, for four years from the effective date of this decision for Commission evaluation unless a longer preservation time is required by law.

7. This proceeding is closed.

This order is effective today.

Dated January 16, 2025, at San Francisco, California.

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.