



Case: A.20-09-019
ALJ: Nojan
Witness: PG&E - Cullings

TURN Cross Examination Exhibit

Exhibit Number: TURN-

PG&E Responses to Data Request

TURN 016, Questions 1, 2, 3, 4 and 8 (public version)

Regarding Overhead System Hardening

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation and Catastrophic Events
Application 20-09-019
Data Response

PG&E Data Request No.:	TURN_016-Q01		
PG&E File Name:	2020WMCE_DR_TURN_016-Q01		
Request Date:	March 30, 2021	Requester DR No.:	PGE-16 (OH)
Date Sent:	May 4, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:	Sandra Cullings	Requester:	Marcel Hawiger

SUBJECT: OVERHEAD SYSTEM HARDENING

QUESTION 01

Please provide the number of the following new assets installed as part of the 2019 OH system hardening work (covered conductor projects):

- a. Recloser;
- b. Switch;
- c. Lightning Arrestor;
- d. Voltage regulator;
- e. Capacitor;
- f. Fuse;
- g. Cutout;
- h. Transformer.

ANSWER 01

PG&E tracks System Hardening work completed at the project level and did not track assets installed at the activity level for 2019. For each job, PG&E tracks the miles completed, but does not track individual assets installed within each order. Please reference Workpaper Table 2.B.2-2 for information on the 2019 System Hardening miles completed.

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation and Catastrophic Events
Application 20-09-019
Data Response

PG&E Data Request No.:	TURN_016-Q02		
PG&E File Name:	2020WMCE_DR_TURN_016-Q02		
Request Date:	March 30, 2021	Requester DR No.:	PGE-16 (OH)
Date Sent:	May 4, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:	Sandra Cullings	Requester:	Marcel Hawiger

SUBJECT: OVERHEAD SYSTEM HARDENING

QUESTION 02

Please provide the number of the following assets that were removed as part of the 2019 OH system hardening work (covered conductor projects):

- a. Recloser;
- b. Switch;
- c. Lightning Arrestor;
- d. Voltage regulator;
- e. Capacitor;
- f. Fuse;
- g. Cutout;
- h. Transformer.

ANSWER 02

PG&E tracks System Hardening work completed at the project level and did not track assets removed at the activity level for 2019. For each job, PG&E tracks the miles completed, but does not track individual assets removed within each order. Please reference Workpaper Table 2.B.2-2 for information on the 2019 System Hardening miles completed.

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation and Catastrophic Events
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PG&E Data Request No.:	TURN_016-Q03		
PG&E File Name:	2020WMCE_DR_TURN_016-Q03		
Request Date:	March 30, 2021	Requester DR No.:	PGE-16 (OH)
Date Sent:	May 4, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:	Sandra Cullings	Requester:	Marcel Hawiger

SUBJECT: OVERHEAD SYSTEM HARDENING

QUESTION 03

For each of the asset types listed in Question 2, that were removed during OH system hardening work in 2019, please provide:

- a. The age of the oldest asset removed;
- b. The age of the youngest asset removed;
- c. The average age of the assets removed.

ANSWER 03

Please see PG&E's response to TURN 016-Q02. PG&E tracks System Hardening work completed at the project level for operational reasons and did not track assets at the activity level for 2019.

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	TURN_016-Q04		
PG&E File Name:	2020WMCE_DR_TURN_016-Q04		
Request Date:	March 30, 2021	Requester DR No.:	PGE-16 (OH)
Date Sent:	April 13, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:	Sandra Cullings	Requester:	Marcel Hawiger

SUBJECT: OVERHEAD SYSTEM HARDENING

QUESTION 04

Did PG&E replace all existing cutouts, switches, arrestors, Regulators, reclosers, and fuses as part of overhead system hardening projects? If no, please explain which asset classes were routinely replaced?

ANSWER 04

PG&E did not replace all existing cutouts, switches, arrestors, regulators, reclosers, and fuses as part of the overhead system hardening projects in 2019. PG&E used System Hardening Design Guidance Standard TD-9001B-009 (attachment 2020WMCE_DR_TURN_016-Q04Atch01) to determine which equipment to replace for each project. These included replacing non-exempt with exempt equipment per the Standard.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	TURN_016-Q08CONF		
PG&E File Name:	2020WMCE_DR_TURN_016-Q08CONF		
Request Date:	March 30, 2021	Requester DR No.:	PGE-16 (OH)
Date Sent:	April 13, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:	Sandra Cullings	Requester:	Marcel Hawiger

SUBJECT: OVERHEAD SYSTEM HARDENING

QUESTION 08

Regarding the OH system hardening projects conducted in 2019:

- a. how did PG&E bid the work for the projects? Did PG&E request “unit price” or “labor and materials” bids, or something else? Please explain in detail, and explain whether all projects were bid the same way or in different ways.
- b. How many different primary contractors (bid winners) worked on OH system hardening projects in 2019?

ANSWER 08

- a. All of the 2019 overhead system hardening projects were based on a lump sum NTE (“not to exceed”) agreement. PG&E develops this type of contract by estimating labor costs, material costs, and adding a specific amount that will cover the contractor’s overhead and profit margin for the specific scope of work. The lump sum contract requires that the contractor agree to provide specified services for a stipulated or fixed price. Under the lump sum agreement, the contractor is responsible for the proper job execution and provides their own means and methods to complete the work, subject to PG&E oversight to ensure the work was completed with the current standards.
- b. PG&E employed the following eight contractors for work on overhead system hardening projects in 2019: