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April 24, 2020

**VIA ULS**

Mr. Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: ULS Licensing Requests, Pacific Gas and Electric Co.**

Dear Mr. Stockdale:

Pacific Gas and Electric Company (“PG&E”) takes this opportunity to supplement its February 12, 2018 and February 26, 2019 letters to you and provide a status update on its five-year corporate probation period related to being found guilty of six felony counts.

As you know, as part of the probation, PG&E has retained a third-party monitor at PG&E’s expense. The goal of the third-party monitor is to help ensure that PG&E takes reasonable and appropriate steps to maintain the safety of its gas and electric operations, and to maintain effective ethics, compliance, and safety related incentive programs on a Utility-wide basis. PG&E continues to cooperate with the monitor.

On November 27, 2018, the United States District Court for the Northern District of California (the “Court”) issued an order requiring PG&E to provide written answers regarding its compliance with the terms of its probation, including what requirements of its probation might be implicated in the event the company’s operation and maintenance of its power lines was determined to be “reckless” or its reporting was found to be “inaccurate, slow or failed,” such that the company was determined to have caused any of the 2017 or 2018 California wildfires. The Court also ordered the Utility to provide “an accurate and complete statement of the role, if any, of PG&E in causing and reporting the recent Camp Fire in Butte County and all other wildfires in California” since January 2017.

In December 2018, the Court issued an order requesting that the Office of the California Attorney General advise the Court on its view regarding the extent to which, if at all, PG&E’s operation and maintenance of its power lines would constitute a crime under California law if it was determined to be reckless.

In early January 2019, the Court issued three additional orders to PG&E requesting information regarding its involvement in the California wildfires. On January 9, 2019, the Court issued an order proposing to add new conditions of probation that, among other things, would require PG&E to re-inspect its electrical grid and fix any components that might have contributed to past wildfires. Further, on January 30, 2019, related to a 2017 California wildfire, the Court found PG&E had violated a condition of its probation with respect to reporting requirements. The sentencing hearing on this probation violation occurred on May 7, 2019. At that hearing, the Court imposed two additional conditions of probation that, among other things, required certain senior PG&E executives and Board members to visit the towns of Paradise and San Bruno and required PG&E's Board of Directors to create a committee that would be responsible for tracking progress of the Wildfire Mitigation Plan PG&E submitted to California Public Utility Commission ("CPUC") on February 6, 2019.

On March 5, 2019, the Court issued an order proposing to add new conditions of probation that, among other things, would require PG&E to fully comply with all applicable laws concerning vegetation management and clearance requirements, fully comply with all targets and metrics set forth in PG&E's Wildfire Mitigation Plan, maintain accurate records of its vegetation management efforts, and ensure sufficient financial and personnel resources are allocated to achieve these outcomes. The Court issued an order imposing these new conditions on April 3, 2019.

On July 26, 2019, the Monitor submitted a letter to the Court providing its preliminary observations and findings regarding PG&E's compliance with aspects of its Wildfire Mitigation Plan's Enhanced Vegetation Management program ("EVM Program"). The Monitor's observations included that, among other things, PG&E had missed trees that should have been identified and worked under the EVM Program and PG&E's systems for recording, tracking, and assigning EVM work were inconsistent and may have contributed to the missed work. PG&E detailed its plans to address the concerns raised by the Monitor in a response filed with the Court on September 3, 2019. The Monitor's concerns and PG&E's response were discussed at a hearing on September 17, 2019.

During the September 17, 2019 hearing, the Court asked PG&E to provide information about its preparation for high wind season and the number of fires 10 acres or greater allegedly caused by PG&E to date in 2019. PG&E responded on October 1, 2019 by describing its efforts to strengthen its programs and infrastructure to maximize safety and mitigate the potential wildfire risk during high wind season. PG&E also responded that as of September 17, 2019, PG&E equipment may have contributed to nine ignitions in 2019 that resulted in fires 10 acres or greater. Two of these fires were potentially caused by vegetation and one was potentially caused by equipment. On October 2, 2019, the Court asked PG&E for further information regarding the three fires potentially caused by vegetation and equipment. In its response, which was filed on October 9, 2019, PG&E provided information regarding certain fires, including but not limited to total acreage of the fire, ignition date, and potential causes.

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On October 14, 2019, the Court issued a request for information in connection with the Public Safety Power Shut-off (“PSPS”) event PG&E initiated on October 9, 2019 that shut off power to approximately 738,000 customers in 34 counties across Northern and Central California, asking PG&E to file a statement setting forth, among other information, “how many trees and limbs fell or blew onto the deenergized lines and how many of those would likely have caused arcing had the power been left on.” PG&E’s response was filed on October 30, 2019.

On November 4, 2019, the Court issued a request for information in connection with PSPS events PG&E initiated in late October of 2019, asking PG&E to file a statement setting forth, among other information, the same type of information requested on October 14, 2019 in connection with the PSPS event initiated on October 9, 2019. PG&E filed its response on November 29, 2019.

On November 12, 2019, the Court approved the request of the City of San Bruno to allow PG&E to satisfy the remainder of its community service requirements by making a \$3 million payment to the City of San Bruno, and on November 27, 2019, the Court signed an order in connection therewith. As a result, on December 10, 2019, the Court paid \$3 million to the City of San Bruno.

On December 20, 2019, the Court ordered PG&E to state whether PG&E is in full compliance with two conditions of its probation: (1) PG&E must fully comply with all applicable laws concerning vegetation management and clearance requirements; and (2) PG&E must fully comply with the specific targets and metrics set forth in its wildfire mitigation plan. PG&E submitted its response to the Court on January 15, 2020.

On January 16, 2020, the Court issued an order to show cause, noting that PG&E had admitted it was not in full compliance with the following conditions of probation: (1) fully complying with all applicable laws concerning vegetation management; and (2) fully complying with specific targets and metrics set forth in its Wildfire Mitigation Plan. The Court set a show cause hearing for February 19, 2020, to discuss why a further condition of probation should not be imposed requiring PG&E to hire sufficient crews to enable it to fully comply with the laws and its Wildfire Mitigation Plan concerning vegetation management. PG&E submitted its response to the Court on February 12, 2020.

On January 24, 2020, the Court issued an additional order to show cause as to why, going forward, PG&E should not restrict all bonuses and other incentives for supervisors and above exclusively to achieving its wildfire mitigation plan and other safety goals. PG&E submitted its response to the Court on February 12, 2020. A hearing in connection with this order occurred on February 19, 2020.

On February 4, 2020, the Court issued an order directing PG&E to provide, by February 18, 2020, additional information in connection with PG&E’s prior responses dated November 29, 2019, December 19, 2019, and January 15, 2020, including regarding assets inspections and the condition of its electric assets. PG&E submitted its response to the Court on February 18, 2020.

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At the show cause hearing on February 19, 2020, the Court ordered PG&E to provide a target number of contract tree trimmers to be employed in 2020. PG&E submitted its response to the Court on March 2, 2020. PG&E's response on March 2, 2020 also provided information regarding PG&E's 2019 inspections of Tower 009/081 on the Cresta-Rio Oso 230 kV Transmission Line (the "Cresta-Rio Oso Line").

On February 21, 2020, the Court ordered PG&E to provide information regarding the relationship between priority codes set forth in PG&E's Electric Transmission Preventive Maintenance Manual and the safety factors specified in General Order 95 promulgated by the CPUC, as well as the application of each to the C-hooks of interest on the Cresta-Rio Oso Line. PG&E submitted its response to the Court on March 2, 2020. On April 2, 2020, PG&E submitted a report to the Court regarding PG&E's March 19, 2020 collection of equipment from the Cresta-Rio Oso Line.

PG&E is complying with all recent orders from the Court seeking information on its compliance with the terms of its probation and has responded to each of the Court's requests for information. PG&E remains committed to complying with its current probation conditions, and will continue to update the Commission as significant developments occur.

Respectfully submitted,



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