

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigations Plans Discovery 2026-2028  
Data Response**

<b>PG&amp;E Data Request No.:</b>	OEIS_011-Q001
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<b>Requester DR No.:</b>	OEIS-P-WMP_2025-PG&E-011
<b>Requesting Party:</b>	Office of Energy Infrastructure Safety
<b>Requester:</b>	Nathan Poon
<b>Date Sent:</b>	May 28, 2025

**SUBJECT:**

**QUESTION 001**

Regarding non-exempt expulsion fuses

In sections 8.2.10.5 (page 219) and 8.4.12.1 (page 287) of its 2026-2028 Base WMP, PG&E describes its non-exempt expulsion fuse removal/replacement program.

- a. In the second paragraph of section 8.2.10.5 on page 219, PG&E states that it will replace additional “non-exempt surge arrestors” should they be found. Explain the difference between these “non-exempt surge arrestors” and the “non-exempt expulsion fuses” described in this section.
- b. PG&E states that it plans to complete the “remaining known population” of non-exempt expulsion fuse removals in 2025. Does the “known population” refer to:  
i) the target for non-exempt expulsion fuse removals from the 2023-2025 WMP (GH-10), ii) the full population of non-exempt expulsion fuses in PG&E’s service territory, iii) a filtered subset of ii) above (e.g., only line-protection-related fuses in the HFTD/HFRA); or iv) a different population. If iii) or iv), explain how the population was defined and filtered, and what methodology or criteria were used to exclude other known non-exempt fuses.
- c. After PG&E completes its planned removals and replacements of non-exempt expulsion fuses in 2025, how many non-exempt expulsion fuses will remain in PG&E’s HFTD/HFRA?
  - i. Of the remaining non-exempt fuses, how many are intended for “line protection” versus “transformer protection?”
  - ii. Of the remaining non-exempt fuses, how many are solid blade disconnects, universal fuse, open link fuse, or other type?
- d. Does PG&E plan to replace all non-exempt fuses in the HFTD/HFRA by 2028? If not, explain the rationale and provide the criteria used to determine which non-exempt fuses will not be replaced.

## ANSWER 001

- a. This is a typographical error. The statement should have been written to say: "Should we find additional non-exempt expulsion fuses; we will promptly replace them." The statement should not have included mention of surge arrestors.
- b. PG&E initially queried the EDGIS database in 2022 to identify the known population of non-exempt line protection fuses in HFTD areas. This original population was used to set non-exempt line protection fuse replacement targets in the 2023-2025 WMP. Subsequently, annually, as we create the following year's work plan, we have refreshed the EDGIS query to identify the updated known population of non-exempt line protection fuses. We use the refreshed known population of non-exempt line protection fuses to create the replacement work plans and ensure that all known non-exempt line protection fuses have either been remediated or are included in the 2025 work plan.
- c. PG&E will complete the identified population of its non-exempt expulsion fuses that were part of this WMP commitment, which include all known non-exempt line protection fuses in HFTD areas described in part b above. PG&E is aware that there may be additional non-exempt expulsion fuses in HFTD areas. Please see subpart (d) for our risk-based approach to addressing non-exempt expulsion fuses.
  - i. All known non-exempt line protection fuses in HFTD areas will be remediated by the end of 2025.
  - ii. Solid blade disconnects are considered switches, not fuses. There are approximately 1,400 solid blade disconnects deployed as part of this WMP commitment.
- d. At this time, PG&E does not plan to programmatically replace non-exempt fuses associated with equipment, as the program was developed in 2019 with a focus on the replacement of known non-exempt line protection fuses at that time. As PG&E reviewed the effectiveness of this program in reducing ignitions, it was revealed there was only one CPUC reportable ignition associated with a non-exempt fuse for the period from 2021 to 2024. Given that we patrol our assets in HFTD areas annually to determine vegetation clearing under all poles in HFTD where there is any non-exempt equipment on the pole in conformance with PRC 4292, PG&E elected to not expand the program. In addition to the pole clearing measure to mitigate against this ignition risk, we opportunistically replace all non-exempt equipment with exempt equipment when performing system hardening, as specified in our Electric Design Manual TD-9001M.