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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2020.

(U 39 M)

Application No. 18-12-009
(Filed: December 13, 2018)

(NOT CONSOLIDATED)

Application of Pacific Gas and Electric Company (U 39 M) to Submit Its 2020 Risk Assessment and Mitigation Phase Report.

Application No. 20-06-012
(Filed June 30, 2020)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U39M) AMENDMENT TO THE
2020 RISK SPENDING ACCOUNTABILITY REPORT
IN COMPLIANCE WITH CALIFORNIA
PUBLIC UTILITIES COMMISSION DECISION 19-04-020**

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Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 24, 2021

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OF THE STATE OF CALIFORNIA**

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Pacific Gas and Electric Company (PG&E) submits this amendment to its 2020 Risk Spending Accountability Report in Compliance with the *Phase Two Decision Adopting Risk Spending Accountability Report Requirements And Safety Performance Metrics For Investor-Owned Utilities And Adopting A Safety Model Approach For Small And Multi-Jurisdictional Utilities*, Decision (D.) 19-04-020. The Report was timely filed on April 1, 2021 in accordance with D.19-04-020. However, minor errors were subsequently identified and this amendment to the Report corrects those errors. The errors are limited to the following MAT Codes in Electric Distribution: 2AP and 08W and the following MAT Code in Gas Distribution: JQK. The affected pages are provided as Attachment A in redline version. Below is a table summarizing the corrections.

Corrected MWC	Original Number	Corrected Number	Explanation for Correction
Gas Distribution – MAT Code JQK (Cross Bore Program) – 2020 Imputed Adopted Units	36,667	36,878	Imputed adopted units are based on the cross bore 2020 GRC settlement formula which uses a ratio between Unable to Access (UTA) units and non-UTA units. As a result of the correction made to actual units, the imputed adopted units are also corrected. (Table 2-3, Line 84)

Corrected MWC	Original Number	Corrected Number	Explanation for Correction
Gas Distribution – MAT Code JQK (Cross Bore Program) – 2020 Actual Units	16,675	16,665	Actual units value had a typographical error. (Table 2-3, Line 84)
Electric Distribution – MAT Code 2AP (OH Capital Projects - Non-exempt fuse replacement) – 2020 Imputed Adopted \$	\$5,425.2	\$5,285.2	Inadvertently used 2021 imputed adopted value instead of the 2020 imputed adopted value. (Table 3-4, Line 56)
Electric Distribution – MAT Code 08W (System Hardening Wildfire Resiliency projects) – 2020 Actual Units	338	352	The miles originally reported did not include the underground miles completed in the Community Rebuild Program and recorded in 08W. (Table 3-4, Lines 21 & 22)

Respectfully Submitted,

PACIFIC GAS AND ELECTRIC COMPANY

By: /s/ Peter Ouborg
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Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 24, 2021

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M) AMENDMENT TO

2020 RISK SPENDING ACCOUNTABILITY REPORT

IN COMPLIANCE WITH CALIFORNIA PUBLIC UTILITIES

COMMISSION DECISION 19-04-020

TABLE 2-3
GAS DISTRIBUTION 2020 EXPENSE COMPARISON BY MAT FOR SAFETY, RELIABILITY, AND MAINTENANCE WORK
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	MWC	MWC Name	MAT	MAT Name	RAMP Risk Name	RAMP Mitigation Name	2020 GRC Testimony Reference	2020 Imputed Adopted Costs (A)	2020 Actual Costs (B)	2020 Cost Difference (B-A)	2020 Cost Percent Change (%) (B-A)/A	2020 Imputed Adopted Units (C)	2020 Actual Units (D)	2020 Unit Difference (D-C)	2020 Unit Percent Change (%) (D-C)/C	Spending Variance Explanation Required (Y/N)	Percentage Variance Explanation Required	Unit Variance Explanation Required (Y/N)	Cost Variance Explanation	Unit Variance Explanation
76	HY	Gas Meter Maintenance	HYI	Meter Set Atmospheric Corrosion Remediation	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 6	1,828.4	2,182.2	353.8	19.3%	40,000	34,069	(5,931)	-15%	NO	NO	NO	Below variance threshold.	Below variance threshold.
77	HY	Gas Meter Maintenance	HY#	Meter Set Maintenance, Other	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 6	0.0	(0.3)	(0.3)	100.0%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
78	JQ	Gas Distribution Integrity Management Program	JQA	DIMP Leak Survey	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 4	668.5	889.5	221.0	33.1%	54,500	32,388	(22,112)	-41%	NO	NO	YES	Below variance threshold.	Actual units were below imputed units due to a shift in base workplan units of measure. In 2020, the base workplan shifted from actual services to main-only surveys (miles), resulting in lower units as compared to the 2020 GRC.
79	JQ	Gas Distribution Integrity Management Program	JQC	Dig-In Reduction Team	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 6	2,479.6	3,371.0	891.4	35.9%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
80	JQ	Gas Distribution Integrity Management Program	JQD	DIMP Emergent Work	SRM Total	SRM Total	Exhibit (PG&E-3), Chapter 4	2,976.4	2,940.6	(35.8)	-1.2%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
81	JQ	Gas Distribution Integrity Management Program	JQD	DIMP Emergent Work	Release of Gas with Ignition on Distribution Facilities - Non-Cross Bore	Mitigation - Curb Valve Replacements	Exhibit (PG&E-3), Chapter 4	1,477.0	253.6	(1,223.4)	-82.8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
82	JQ	Gas Distribution Integrity Management Program	JQE	Plastic Program	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 4	312.1	147.1	(165.0)	-52.9%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
83	JQ	Gas Distribution Integrity Management Program	JQG	Fitting Mitigation Program	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 4	994.7	690.7	(303.9)	-30.6%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
84	JQ	Gas Distribution Integrity Management Program	JQK	Cross Bore Program	SRM Total	SRM Total	Exhibit (PG&E-3), Chapter 4	29,878.0	31,752.1	1,874.1	6.3%	36,878	16,665	(20,213)	-55%	NO	NO	YES	Below variance threshold.	Imputed units are based on a ratio between Unable to Access (UTA) units and non-UTA units. For 2020, PG&E completed 16,665 cross-bore inspection units of which 4,016 were UTAs and 12,649 were non-UTAs. Using the 2020 GRC settlement formula, if 4,016 UTAs are performed, the imputed number of non-UTA units is 32,862. Thus PG&E performed 20,213 fewer non-UTA units than imputed. Drivers for this are: 1) Work performed in San Francisco was more complex and took longer to complete due to infrastructure, pipe condition, permitting requirements, and 2) Targeted higher risk work in San Francisco before addressing non-UTAs in other areas.
												26,667	16,675	(19,992)						Imputed units are based on a ratio between Unable to Access (UTA) units and non-UTA units. For 2020, PG&E completed 16,675 cross-bore inspection units of which 4,113 were UTAs and 12,562 were non-UTAs. Using the 2020 GRC settlement formula, if 4,113 UTAs are performed, the imputed number of non-UTA units is 32,554. Thus PG&E performed 19,992 fewer non-UTA units than imputed. Drivers for this are: 1) Work performed in San Francisco was more complex and took longer to complete due to infrastructure, pipe condition, permitting requirements, and 2) Targeted higher risk work in San Francisco before addressing non-UTAs in other areas.
85	JQ	Gas Distribution Integrity Management Program	JQK	Cross Bore Program	Release of Gas with Ignition on Distribution Facilities - Cross Bore	Mitigation - Cross-Bore Program	Exhibit (PG&E-3), Chapter 4	29,878.0	31,752.1	1,874.1	6.3%	36,667	16,675	(19,992)	-55%	N/A	N/A	N/A	N/A	N/A
86	JQ	Gas Distribution Integrity Management Program	JQL	DIMP Program Management	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 4	4,233.7	4,301.2	67.5	1.6%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.
87	OM	Operational Management	OM#	Operational Management	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	Exhibit (PG&E-3), Chapter 2	17,023.5	14,363.0	(2,660.6)	-15.6%	N/A	N/A	N/A	N/A	NO	NO	NO	Below variance threshold.	Below variance threshold.

(a) The forecast for this MAT was non-utilized in the 2020 GRC, and therefore, PG&E does not have imputed adopted units. A count of the operations completed is captured in SAP, however, the operations do not equate to units because they encompass a variety of different O&M activities. Therefore, this information is not included in this table.

(b) Includes below ground grade 3 leak repairs recorded under Leak Abatement MWC LW. In 2020, approximately \$109.8 under MWC LW will be realigned to MWC FI. The correction will be captured as part of 2021 recorded data. In addition, 14 units recorded under MWC LW will be realigned to MWC FI.

TABLE 3-4
ELECTRIC DISTRIBUTION 2020 CAPITAL COMPARISON BY MAT CODE FOR SAFETY, RELIABILITY, AND MAINTENANCE WORK
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	MWC	MWC Name	MAT	MAT Name	RAMP Risk Name	RAMP Mitigation Name	2020 GRC Testimony Reference	2020 Imputed Adopted Costs (A)	2020 Actual Costs (B)	2020 Cost Difference (B-A)	2020 Cost Percent Change (%) (B-A)/A	2020 Imputed Adopted Units (C)	2020 Actual Units (D)	2020 Unit Difference (D-C)	2020 Unit Percent Change (%) (D-C)/C	Spending Variance Explanation Required (Y/N)	Percentage Variance Explanation Required (Y/N)	Unit Variance Explanation Required (Y/N)	Cost Variance Explanation	Unit Variance Explanation
21	08	Electric Distribution Overhead Asset Replacement	08W	System Hardening Wildfire Resiliency projects	SRM Total	SRM Total	4-9	\$ 493,225.0	\$ 484,810.4	\$ (8,414.6)	-1.7%	221	352	131	59.2%	NO	NO	YES	Below variance threshold.	The increase in units was due to the response to the 2020 lightning complex wildfires. Following those events, a new strategy was engaged to rebuild much of the damaged areas in compliance with the Fire Rebuild Design guidance where significant damage was assessed. These additional miles were funded in 08W alongside the normal planned units whilst the excess planned units were postponed until future years.
													338-	447-	62.6%					
													352	131	59.2%	N/A	N/A	N/A	N/A	N/A
													338-	447-	62.6%					
22	08	Electric Distribution Overhead Asset	08W	System Hardening Wildfire Resiliency	RAMP Risk: WF Mitigation	M12 - Wildfire System Hardening	4-9	\$ 493,225.0	\$ 484,755.5	\$ (8,469.5)	-1.7%	221	352	131	59.2%	N/A	N/A	N/A	N/A	N/A
													338-	447-	62.6%					
23	08	Electric Distribution Overhead Asset Replacement	#	Not assigned	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-9	\$ -	\$ (541.2)	\$ (541.2)	-100.0%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
24	09	Electric Distribution Automation & Protection	09A	ED Line SCADA Install/Replace	SRM Total	SRM Total	4-10	\$ 5,517.7	\$ 66.6	\$ (5,451.1)	-98.8%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
25	09	Electric Distribution Automation & Protection	09A	ED Line SCADA Install/Replace	RAMP Risk: WF Mitigation	M15 - Automation and Protection	4-10	\$ -	\$ 50.6	\$ 50.6	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	09	Electric Distribution Automation & Protection	09B	ED Sub SCADA/RTU Replace	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-10	\$ 14,445.2	\$ 11,428.8	\$ (3,016.3)	-20.9%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
27	09	Electric Distribution Automation & Protection	09D	ED Sub SCADA/RTU Install	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-10	\$ 9,405.4	\$ 14,307.2	\$ 4,901.8	52.1%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
28	09	Electric Distribution Automation & Protection	09E	ED Sub Protect Relay Install/Replace	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-10	\$ 3,314.7	\$ 3,617.4	\$ 302.6	9.1%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
29	09	Electric Distribution Automation & Protection	09F	ED Sub SCADA Emergency Replace	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-10	\$ 1,161.6	\$ 8,083.9	\$ 6,922.4	595.9%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
30	17	Electric Distribution Routine Emergency	N/A	Not assigned	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-4	\$ 183,518.1	\$ 247,499.6	\$ 63,981.5	34.9%	N/A	N/A	N/A	N/A	YES	YES	N/A	Program expenditures exceeded imputed values due to higher than forecast volume of emergency events, driving higher overall contract spend, higher estimating over head costs, and higher labor charges.	Below variance threshold.
31	21	Miscellaneous Capital and Emergency Preparedness & Response	#	Not assigned	SRM Total	SRM Total	4-18	\$ (26,116.0)	\$ 1,685.2	\$ 27,801.2	-106.5%	N/A	N/A	N/A	N/A	YES	YES	N/A	Program expenditures exceeded imputed adopted amounts due to the inclusion of capital efficiencies in MWC 21 in the 2020 GRC filing resulting in a negative imputed value. Any efficiencies achieved would be captured in the areas impacted by the process change and would not materialize in MWC 21. The recorded costs in MWC 21 represent the cost for emergency and preparedness response work not assigned to a mitigation for electric distribution in 2020.	Below variance threshold.
32	21	Miscellaneous Capital and Emergency Preparedness & Response	#	Not assigned	RAMP Risk: WF Mitigation	M19 - Expanded Weather Station Deployment	4-3	\$ 6,300.0	\$ -	\$ (6,300.0)	-100.0%	300	0	(300)	-100.0%	N/A	N/A	N/A	N/A	N/A
33	21	Miscellaneous Capital and Emergency Preparedness & Response	#	Not assigned	RAMP Risk: WF Mitigation	M21 - Advanced Fire Modeling	4-3	\$ 4,200.0	\$ -	\$ (4,200.0)	-100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34	21	Miscellaneous Capital and Emergency Preparedness & Response	#	Not assigned	RAMP Risk: WF Mitigation	M24 - Enhanced Wire Down Detection	4-3	\$ -	\$ 406.1	\$ 406.1	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
35	21	Miscellaneous Capital and Emergency Preparedness & Response	#	Not assigned	RAMP Risk: WF Mitigation	M28 - CWSP Program Management Office	4-3	\$ 554.9	\$ -	\$ (554.9)	-100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
36	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	SRM Total	SRM Total	4-3	\$ 1,187.3	\$ 16,803.4	\$ 15,616.1	1315.2%	N/A	N/A	N/A	N/A	NO	YES	N/A	Program expenditures exceeded imputed regulatory values due in large part to wildfire mitigations that were forecast in MAT 21# being recorded in MAT 21A.	Below variance threshold.
37	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M13 - Public Safety Power Shutoff	4-3	\$ -	\$ 2,396.9	\$ 2,396.9	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
38	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M18 - Wildfire Safety Operations Center	4-3	\$ -	\$ (34.1)	\$ (34.1)	-100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
39	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M19 - Expanded Weather Station Deployment	4-3	\$ -	\$ 8,334.3	\$ 8,334.3	100.0%	0	404	404	100.0%	N/A	N/A	N/A	N/A	N/A
40	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M21 - Advanced Fire Modeling	4-3	\$ -	\$ 898.8	\$ 898.8	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 3-4
ELECTRIC DISTRIBUTION 2020 CAPITAL COMPARISON BY MAT CODE FOR SAFETY, RELIABILITY, AND MAINTENANCE WORK
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	MWC	MWC Name	MAT	MAT Name	RAMP Risk Name	RAMP Mitigation Name	2020 GRC Testimony Reference	2020 Imputed Adopted Costs (A)	2020 Actual Costs (B)	2020 Cost Difference (B-A)	2020 Cost Percent Change (%) (B-A)/A	2020 Imputed Adopted Units (C)	2020 Actual Units (D)	2020 Unit Difference (D-C)	2020 Unit Percent Change (%) (D-C)/C	Spending Variance Explanation Required (Y/N)	Percentage Variance Explanation Required (Y/N)	Unit Variance Explanation Required (Y/N)	Cost Variance Explanation	Unit Variance Explanation
41	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M24 - Enhanced Wire Down Detection	4-3	\$ -	\$ 809.5	\$ 809.5	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
42	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	M25 - Wildfire and Infrastructure Protection Teams	4-3	\$ -	\$ 1,253.9	\$ 1,253.9	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
43	21	Miscellaneous Capital and EP&R	21A	EP&R Capital	RAMP Risk: WF Mitigation	Post 2020 GRC Mitigations	N/A	\$ -	\$ 2,626.2	\$ 2,626.2	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
44	21	Miscellaneous Capital and EP&R	21B	Capital projects for other LOB	SRM Total	SRM Total	4-3	\$ -	\$ (19.4)	\$ (19.4)	-100.0%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
45	21	Miscellaneous Capital and EP&R	21B	Capital projects for other LOB	RAMP Risk: WF Mitigation	M19 - Expanded Weather Station Deployment	4-3	\$ -	\$ (19.4)	\$ (19.4)	-100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
46	25	Install New Electric Meters	N/A	Not assigned	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	6-6	\$ -	\$ 24,204.9	\$ 24,204.9	100.0%	N/A	N/A	N/A	N/A	YES	YES	N/A	Program expenses exceeded imputed regulatory values due to transfer of this program from Customer Care to Electric Distribution in 2018.	Below variance threshold.
47	2A	Electric Distribution Preventive Maintenance OH	2AA	OH General Replace	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 58,169.3	\$ 179,549.3	\$ 121,380.1	208.7%	12,079	13,716	1,637	13.6%	YES	YES	NO	Program expenditures exceeded imputed adopted amounts due to higher volume of tags and contract use due to higher demand (Tier 2 and Tier 3 HFTD area tag volume) than resources available.	Below variance threshold.
48	2A	Electric Distribution Preventive Maintenance OH	2AB	Bird Safe Install/Replacement	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 3,084.3	\$ 1,997.0	\$ (1,087.3)	-35.3%	1,211	500	(711)	-58.7%	NO	NO	YES	Below variance threshold.	Actual units were lower than imputed units due to resource scheduling on higher priority WSIP tags and PSPS events.
49	2A	Electric Distribution Preventive Maintenance OH	2AC	Bird Safe Install/Replace Annual	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 2,528.8	\$ 5,977.3	\$ 3,448.5	136.4%	990	399	(591)	-59.7%	NO	NO	YES	Below variance threshold.	Actual units were lower than imputed units due to resource scheduling on higher priority WSIP tags and PSPS events.
50	2A	Electric Distribution Preventive Maintenance OH	2AE	OH COE Replace	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 31,209.3	\$ 44,510.0	\$ 13,300.7	42.6%	1,465	1,102	(363)	-24.8%	NO	YES	YES	Program expenditures exceeded imputed adopted amounts due to higher use of contract resources.	Actual units were lower than imputed units due to resource scheduling on higher priority WSIP tags and PSPS events.
51	2A	Electric Distribution Preventive Maintenance OH	2AF	OH Idle Facility Remove	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 9,809.6	\$ 5,867.5	\$ (3,942.1)	-40.2%	2,219	673	(1,546)	-69.7%	NO	NO	YES	Below variance threshold.	Actual units were lower than imputed units due to re-prioritization of work plan to address other higher risk maintenance work.
52	2A	Electric Distribution Preventive Maintenance OH	2AG	SF Series Streetlights	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ -	\$ 29.8	\$ 29.8	100.0%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
53	2A	Electric Distribution Preventive Maintenance OH	2AH	LED Streetlights	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ -	\$ 2,519.9	\$ 2,519.9	100.0%	0	8,204	8,204	100.0%	NO	NO	YES	Below variance threshold.	Actual units were higher than imputed units due to the program extending beyond the forecasted completion in 2019.
54	2A	Electric Distribution Preventive Maintenance OH	2AI	SF Historical Streetlights	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ -	\$ 477.5	\$ 477.5	100.0%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
55	2A	Electric Distribution Preventive Maintenance OH	2AP	OH Capital Projects	SRM Total	SRM Total	4-6	\$ 13,479.8	\$ 8,368.3	\$ (5,111.4)	-37.9%	625	643	18	2.9%	NO	NO	NO	Below variance threshold.	Below variance threshold.
56	2A	Electric Distribution Preventive Maintenance OH	2AP	OH Capital Projects - Non-exempt fuse replacement	RAMP Risk: WF Mitigation	M12 - Wildfire System Hardening	4-6	\$ 5,285.2	\$ 7,846.6	\$ 2,561.4	48.5%	625	643	18	2.9%	N/A	N/A	N/A	N/A	N/A
								\$ 6,426.2	\$ 2,753.4	\$ -2,421.4	44.6%									
57	2A	Electric Distribution Preventive Maintenance OH	2AQ	Ceramic Post Insulators	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ -	\$ 2,753.4	\$ 2,753.4	100.0%	N/A	N/A	N/A	N/A	NO	NO	N/A	Below variance threshold.	Below variance threshold.
58	2A	Electric Distribution Preventive Maintenance OH	2AR	Surge Arrester Replacement	SRM Total	SRM Total	4-6	\$ 73,485.9	\$ 63,498.0	\$ (9,987.9)	-13.6%	19,340	14,362	(4,978)	-25.7%	NO	NO	YES	Below variance threshold.	Actual units were lower than imputed units due to limitations in field variables concerning contractors performing work and change in strategy to prioritize work on more difficult units in Tier 2 and 3 HFTD areas.
59	2A	Electric Distribution Preventive Maintenance OH	2AR	Surge Arrester Replacement	RAMP Risk: WF Mitigation	M5 - Non-exempt Surge Arrester Replacement Program	4-6	\$ 73,485.9	\$ 63,498.0	\$ (9,987.9)	-13.6%	19,340	14,362	(4,978)	-25.7%	N/A	N/A	N/A	N/A	N/A
60	2A	Electric Distribution Preventive Maintenance OH	2AS	FAS Overhead Capital	SRM Total (Non-RAMP)	SRM Total (Non-RAMP)	4-6	\$ 737.1	\$ 213.7	\$ (523.3)	-71.0%	2,328	1,271	(1,057)	-45.4%	NO	NO	YES	Below variance threshold.	Actual units were lower than imputed units due to re-prioritization of work plan to address other higher risk maintenance work.