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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.

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

(U 39 M)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U39M) 2019 RISK SPENDING
ACCOUNTABILITY REPORT IN COMPLIANCE WITH CALIFORNIA PUBLIC
UTILITIES COMMISSION DECISION 19-04-020**

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Dated: March 30, 2020

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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Pacific Gas and Electric Company (PG&E) submits its 2019 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 (Decision).

The Decision requires PG&E to incorporate its new requirements in its annual Risk Spending Accountability Report (RSAR) beginning with its 2020 RSAR due March 31, 2021.¹ For PG&E, the reporting requirements adopted in its 2017 General Rate Case Decision, D. 17-05-013 are superseded by the new requirements in the Decision.² At the request of Energy Division, PG&E is endeavoring to comply with this Decision in its 2019 RSAR to the extent possible.³

The Decision requires the list of programs that are related to safety, reliability, or maintenance “be separated into risk mitigation programs identified in the risk assessment and mitigation phase (RAMP).”⁴ PG&E’s first RAMP, filed in 2017, is the foundation for PG&E’s 2020 GRC for the years 2020-2022. As there is no RAMP mitigation information for PG&E’s 2017 GRC, PG&E includes in this report the Major Work Categories and Maintenance Activity

¹ Decision, Ordering Paragraph (OP) 9.

² Decision, pp. 43, 54.

³ Letter from Energy Division “Review of the Pacific Gas and Electric Company 2016 Budget Report and 2017-2018 Spending Accountability Reports”, dated November 6, 2019, p. 2.

⁴ D.19-04-020, Attachment 2, p. 1.

Type codes associated with each safety-related risk identified in PG&E's risk register, as provided in PG&E's 2017 GRC.

The Decision contains new variance thresholds for the investor-owned utilities, with an option for PG&E to continue to follow its prior reporting thresholds.⁵ PG&E in this RSAR has elected to follow the reporting requirements in the Decision.

PG&E's 2019 RSAR is provided as Attachment A.

Respectfully Submitted,

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⁵ Decision, p. 41, fn. 75.