

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_050-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_050-Q01		
Request Date:	March 5, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-16
Date Sent:	March 10, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update and PG&E's Supplemental Filing on February 26, 2021.

**QUESTION 01**

In PG&E's Supplemental Filing, in response to Action PGE-26 (Class B), PG&E stated that their earlier response to Condition PGE-2 in their September 2020 Quarterly Report required correction.

In the September 2020 Quarterly Report, page (p.) 98, PG&E stated the following:

One reason why we have higher than expected equipment failures is the current protocol for categorizing "initiating events." At this time, when a PG&E first responder is unable to identify the cause for ignition in a timely manner, our reporting standards and requirements direct that the ignition cause is defaulted to equipment failure. In many instances, this designation may not properly categorize the true cause for ignition, but it remains documented as such.

In the Supplemental Filing, p. 34, PG&E stated the following:

PG&E has a detailed process for investigating the cause of every potentially PG&E-attributable ignition event and correcting systems of record when discrepancies are identified. This investigation process and associated systems of record do not have a default for a suspected initiating cause.

- a. Which of the two statements above is currently accurate?
- b. Please explain why, in the September 2020 Quarterly Report, PG&E stated that its reporting standards and requirements directed that the ignition cause default to "equipment failure."
- c. If the statement in the September 2020 Quarterly report quoted above is not accurate, why did PG&E make the representation it did in that report?
- d. If the statement in the September 2020 Quarterly report quoted above is not accurate, how did PG&E come to understand that the statement in the September 2020 Quarterly Report quoted above was inaccurate?
- e. Please describe the process that PG&E currently uses for investigating the cause of a potentially PG&E-attributable ignition event.

- f. Please describe what steps would need to be taken prior to an ignition cause being listed as “equipment failure.” This could include actions taken by the first responder, by an investigating team, quality control, etc.

## **ANSWER 01**

- a. The statement from p. 34 of our Supplemental Filing is the correct statement.
- b. The statement was written by employees who misunderstood PG&E’s ignition investigations process and thus mistakenly included the statement regarding defaulting to equipment failure.
- c. See above.
- d. PG&E became aware of the inaccuracy while reviewing the supplemental questions in response to our September 2020 quarterly report.
- e. PG&E has a multi-layered process for investigating each potentially company attributable ignition event:
  - 1. PG&E first responders identify potential attributable ignition events in the field and record these events in field-based dispatch platforms for first responders. First responders are required to determine suspected initiating event and there are no default options. Our first responders have the option of choosing ‘Unknown’ for suspected initiating event.
  - 2. PG&E’s Electric Incident Investigations (EII) team reviews new ignition records from our field-based platforms twice a week and performs a preliminary review. EII reviews information in additional systems to corroborate key details, including suspected initiating event.
  - 3. The EII team assigns Ignition Investigators to further analyze and investigate each ignition record. This process includes interviews with first responders, reviews with engineering, and the collection of external-party fire reports based on event complexity.
  - 4. If a discrepancy in a key ignition event detail is discovered (such as the suspected initiating cause), PG&E corrects the datapoint in our systems of record associated with that ignition event. For example, there were over 500 of these system corrections in 2020.
  - 5. Completed investigation data is shared regularly with internal stakeholders and records are corrected based on further analysis and feedback from this stakeholder group. As an example, PG&E’s Asset Failure Analysis team reviews the majority of CPUC reportable ignition events where the suspected initiating cause is attributed to equipment failures.
- f. See above.