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

PG&E Data Request No.:	TURN_022-Q03		
PG&E File Name:	WildfireMitigationPlans_DR_TURN_022-Q03		
Request Date:	March 10, 2021	Requester DR No.:	WMP 2021 DR TURN-PGE-008
Date Sent:	March 16, 2021	Requesting Party:	The Utility Reform Network
PG&E Witness:		Requester:	Tom Long

QUESTION 03

In Table 12 of Attachment 1, PG&E gives an RSE of 5910.67 for the distribution Vegetation Management activity discussed in Section 7.3.5.2 of the WMP. In addition, on p. 11 of the WMP, PG&E states:

> "PG&E's routine VM program inspects all of our approximately 100,000 miles of overhead electric facilities at least annually to identify and clear vegetation that might grow or fall into utility equipment to reduce the risk of contact and ignition. In addition to routine VM practices, PG&E's EVM Program inspected and further trimmed or removed vegetation on over 4,300 line-miles (~17 percent) of distribution lines within HFTDs between 2019 and 2020. In 2021, informed by updated risk modeling, we will deploy EVM on another 1,800 miles of distribution lines as part of our ongoing and multiyear effort to reduce the risk of vegetation contact incidents involving our electric distribution lines in HFTD areas." (footnote omitted).

a. Please provide the inputs and calculation to derive this RSE value and please also provide a written explanation of how PG&E derived the value.

b. Please explain whether or not the RSE value is solely for PG&E's routine VM program (as explained in the quote above and in Section 7.3.5 of the WMP) or includes some or all activities in PG&E's EVM program. Please identify any EVM activities that are included in the RSE calculation, as well as any EVM activities that are excluded.

c. Please provide the information provided in each column of Table 12 of Attachment 1 for WMP Initiative 7.3.5.2, broken down as follows:

   i. Routine VM

   ii. EVM

   iii. Please explain how the RSE information given in response to "i" and "ii" above correlates to the RSE value of 5910.67 given in Table 12 of Attachment 1.

   iv. Please explain what EVM activities are included in the response to "ii" above.

d. Please explain whether the RSE value for EVM given in 3(c)(ii) reflects risk reduction incremental to Routine VM work. If not, why not?

ANSWER 03

a. The inputs to derive this RSE value are as follows and are available in the workpaper provided for this initiative.

Input		2020	2021	2022
Exposure	**HFTD**	100%	100%	100%
	Non-HFTD	100%	100%	100%
Financials		$ 1,097,664,936.49	$ 1,065,058,689.54	$ 1,023,428,688.66
Effectiveness*		99.40%	99.40%	99.40%
Benefit Length		1 Year	1 Year	1 Year

*Effectiveness calculation is based on the projected number of trees that will be worked in 2020, 2021 and 2022 (1.5 M, 1.4M, and 1.4M trees respectively). More details are in the associated workpaper.

The calculation methodology for the RSE calculation is explained in the attachment submitted with the 2021 WMP, "RSE light Methodology WMP 2021.pdf" and is also attached to this response as "WildfireMitigationPlans_DR_TURN_022-Q03Atch01."

b. The RSE value is solely for PG&E's routine vegetation management (VM) program. Note that routine VM financials include EVM dollars because EVM patrols are used for inspecting distribution circuit miles as part of routine VM.

c.

i. and ii. Initiative 7.3.5.2 encompasses Routine Distribution, Enhanced Distribution and Tree Mortality Costs Broken out as noted below. Analysis of 2020 actual spend was used to determine the percentage split of work between each related WMP initiative.

		2020 Actual					2021					2022				
		VMBA (MWC H	EVM (MWC IG)	Tree Mortality	CQ (MWC CQ)	Total	VMBA (MWC HN	EVM (MWC IG)	Tree Mortality (M	CQ (MWC CQ)	Total	VMBA (MWC HM	EVM (MWC IG)	Tree Mortality (M	CQ (MWC CQ)	Total
	Spend/Forec	$736,319,975	$454,705,358	$87,805,157	$120,610,944	$1,399,441,433	$667,891,503	$535,516,382	$67,542,131	$143,227,939	$1,414,177,955	$609,620,584	$555,984,663	$68,775,193	$147,142,485	$1,381,522,925

		2020 Actual					2021					2022				
Initiative	Short Descrip	VMBA	EVM	Tree Mortality	CQ	Total	VMBA	EVM	Tree Mortality	CQ	Total	VMBA	EVM	Tree Mortality	CQ	Total
7.3.5.2	Percentages	97%	66%	98%	0%		97%	66%	98%	0%		97%	66%	98%	0%	
7.3.5.2	Dollars	$711,924,277	$300,061,529	$85,679,131	$0	$1,097,664,936	$645,762,972	$353,388,984	$65,906,734	$0	$1,065,058,690	$589,422,680	$366,896,069	$67,109,940	$0	$1,023,428,689

iii. The RSE value of 5910.67 is for Routine VM only

iv. The below initiatives have been combined into Initiative 7.3.5.2. These are the activities being described by initiative.

- 7.3.5.20: Vegetation management to achieve clearances around electric lines and equipment
- 7.3.5.11: Patrol inspections of vegetation around distribution electric lines and equipment
- 7.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment

d. Yes, the RSE value for EVM reflects risk reduction incremental to Routine VM work. Routine VM is treated as a control, which means the baseline risk of vegetation already factors in routine work performed each year. As EVM is a mitigation, EVM will additionally capture any risk reduction by performing this work on top of the existing Routine VM, further lowering the vegetation attributed risk.