

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

PG&E Data Request No.:	CalAdvocates_041-Q06		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_041-Q06		
Request Date:	February 19, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-07
Date Sent:	February 24, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

**SUBJECT: PG&E'S CLIMATE RESILIENCE TEAM**

The following questions related to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

**QUESTION 06**

P. 375 of PG&E's 2021 WMP states,

PG&E's Climate Resilience Team specifically evaluated whether the High Fire Risk Area (HFRA) Map (described in Section 4.2.1) that is used to inform some near-term Wildfire Mitigation Plan (WMP) initiatives is consistent with projected increases in wildfire risk due to climate change. PG&E found that the HFRA Map is consistent with expected wildfire risk intensification and spread patterns as a result of climate change.

- a. Please expand on the statement above. How did the Climate Resilience Team evaluate whether the HFRA Map is consistent with projected increases in wildfire risk due to climate change? (For example, please discuss any methodologies used, the data studied, etc.)
- b. For purposes of the evaluation discussed above, what sources did PG&E use to determine "expected wildfire risk intensification and spread patterns as a result of climate change"?
- c. Please provide any reports, white papers, or memos that describe PG&E's evaluation process and conclusions from the evaluation discussed above.

**ANSWER 06**

- a. At the outset, it should be noted that PG&E's Climate Resilience Team proactively conducted the HFRA map evaluation as a due diligence measure. The HFRA map is primarily a tool that informs near-term decision-making (months to a few years), so decadal trends in fire risk are not directly applicable to the nature of the tool and how it is used today.

However, PG&E was motivated to investigate whether near-term wildfire mitigation measures targeted using the HFRA map would be warranted given expected future

conditions.<sup>1</sup> In other words, would PG&E's near-term investments in wildfire mitigation also be valuable in the long-term given future wildfire risk conditions.

The Climate Resilience Team, with quantitative support from ICF's climate resilience specialists, compared the extent of the HFRA map to the best available wildfire projections from California's Fourth Climate Change Assessment (Westerling, 2018).<sup>2</sup> The study determined that the HFRA map encompasses almost the entirety of areas that will be subject to increased wildfire risk as a result of climate change in 2025 and 2050, and is therefore likely a significantly effective tool in accounting for wildfire risk in the near-term and long-term.

Additionally, the study highlighted that wildfire risk is projected to intensify in areas where risk is already high as well as spread outward from current high-risk areas. This indicates that wildfire mitigation investments made today may continue to provide value into the climate-altered future.

- b. Consistent with CPUC guidance, PG&E utilized the wildfire projections developed as part of California's Fourth Climate Change Assessment (Westerling, 2018).
- c. Please see [WildfireMitigationPlans\_DR\_CalAdvocates\_041-Q06\_Atch01\_CONF] which is a PowerPoint summary document detailing the outcomes of this analysis.

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<sup>1</sup> PG&E's HFRA map is based on the CPUC's High Fire Threat District maps but includes several additional key forested areas that represent wildfire risk within PG&E's service area.

<sup>2</sup> Per [Decision 19-10-054](#) the California Public Utilities Commission has explicitly endorsed the studies and data encompassed by California's Fourth Climate Change Assessment as the preferred source for IOU's assessing climate vulnerability.