

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

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PG&E Witness:		Requester:	Ryan Arba

QUESTION 09

Regarding PG&E's process for choosing the circuit segments prioritized for distribution system hardening (discussed in PG&E's 2021 WMP in Section 7.3.3.17):

- a. Is the same process used to determine which circuit segments are targeted for mitigation as the process for determining if the proposed mitigation will be effective in reducing risk (i.e. the answers to the previous question)?
- b. If the process has any differences, answer the questions above in relation to the process for choosing the circuit segments prioritized for mitigation.
- c. PG&E states in its 2021 WMP that it “also considers secondary risks and benefits as part of the System Hardening Program effort.” (p. 548)
 - i. How are these secondary risks and benefits considered when choosing which circuit segments to prioritize?
 - ii. Are these secondary risks and benefits considered in relation to location, which mitigations will be effective, or both?
- d. PG&E's states in its 2021 WMP that its “System Hardening Program focuses on the mitigation of potential catastrophic wildfire risk caused by distribution overhead assets. This program targets the highest wildfire risk miles... The highest wildfire risk miles are separated into three categories.” (p.548)
 - i. Does PG&E target the highest wildfire risk miles from all three categories targeted equally? If not, how are the categories weighted?
 - ii. How does PG&E determine which circuit segments qualify as the highest wildfire risk miles for the “PSPS mitigation projects” (the third item in this list)?

ANSWER 09

- a. See PG&E's response to Question 8, subpart (a) explaining that the additional information is used to determine the type of system hardening for a specific project, not to adjust the risk ranking from the 2021 Wildfire Distribution Risk Model.
- b. See subpart (a).

c.

- i) Only one of those secondary risks currently drive the selection of a new project, and that is a targeted PSPS mitigation type. The others are not used to drive the selection of a circuit segment for inclusion in the workplan.
- ii) For the PSPS mitigation, we consider both location and the type of system hardening to be performed. Specifically, the location is related to mitigating PSPS impacts and the PSPS mitigation uses undergrounding and line relocation to achieve the risk reduction.

d.

- i) The top 20% is prioritized within the planned portion of the program whilst approximately 10% is set-aside for specific PSPS mitigation projects. The PSPS mitigation projects require underground and have long lead times for execution limiting how much is reasonable to include in any given year. Fire Rebuild miles are dependent on the damage seen within the year. In 2020, the damage and required rebuild exceeded that of the planned miles in 2020 and will continue in years to come as customers return to the affected areas.
- ii) PSPS mitigation projects are selected within the top quartile of PSPS risk and through customer outreach. Top quartile risk amounts to >8 frequency impacted circuits or >1200 annualized customer impact over the 10-year lookback, as well as the 2019-2020 top quartile threshold of >3 events and >1600 customers. Customer outreach has determined much of the opportunities for PSPS mitigation and that work was prioritized if within the top quartile of circuits and where the scope is limited and considered executable in the near term.