

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigation Plans Discovery 2022  
Data Response**

PG&E Data Request No.:	CalAdvocates_015-Q07		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_015-Q07		
Request Date:	March 11, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-15
Date Sent:	March 16, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission.

**QUESTION 07**

Page 140 of PG&E's 2022 WMP states the following:

To avoid exposing the model to misleading data, the training events are restricted to June through November. This does not require the assumption that no wildfires are possible in other months, but only that any ignitions and wildfires that do occur would have the same relationship with the model covariates as the ones the model is already trained on.

Please provide workpapers or other available supporting evidence to support the statement that “any ignitions and wildfires that do occur [in months other than June through November] would have the same relationship with the model covariates as the ones the model is already trained on.”

**ANSWER 07**

The analysis supporting the statement that “any ignitions and wildfires that do occur [in months other than June through November] would have the same relationship with the model covariates as the ones the model is already trained on”, was completed as part of the WDRM v2 development and is provided below.

The figure below illustrates how the timeseries data on counts of outages of different types and “Storm Days” in grey, line up in time. Each year it can be observed that storms in general and the failures associates with them peak during winter months, with storm days producing a wide variety of correlated failures. However, the number of ignitions (shown in red) peak during Summer and early Fall when the rates of outages in general are at or near their background levels. From this we conclude that the same failure modes that produce ignitions during the Summer are occurring all year round, but fortunately without the enabling conditions for fires to grow large enough to be observed and reportable.

