

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

PG&E Data Request No.:	MGRA_002-Q04		
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Request Date:	March 23, 2022	Requester DR No.:	MGRA-PGE-WMP22_DataRequest2
Date Sent:	March 28, 2022	Requesting Party:	Mussey Grade Road Alliance
PG&E Witness:		Requester:	Joseph Mitchell

SUBJECT: EPSS AND PSPS

QUESTION 04

On p. 860, Figure PG&E 8.1-3, guideline categories are shown for Asset, Vegetation, and Consequence. Is the “Consequence” category the result of PG&E’s application of its “Black Swan” criteria, in which it shuts off power under conditions of high fire spread without regard to ignition probability?

ANSWER 04

The category “Consequence” in Figure PG&E 8.1-3 refers to Catastrophic Fire Behavior (CFB) locations that have concurrence of an increased probability for large fires and increased probability of wind-related ignitions on the distribution system. Additionally, the CFB criteria are used to identify locations that may have a lower probability of ignition but could result in fires that are not easily suppressed and have potentially high consequences. These locations are identified using fire spread simulations from Technosylva which are computerized simulations of wildfire behavior given an ignition at a location on a particular date. Consequences of fire spread simulations were not considered for PSPS in previous years and were included in 2021 PSPS decision making under the Catastrophic Fire Behavior.

In 2020 PG&E used “Black Swan” to account for high consequence, low probability (“black swan”) events. The inclusion of Black Swan Guidance allowed PG&E to identify lines that may show, for example, low wind-related outage probability but may experience conditions that have been present in some past, catastrophic fire incidents.