

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response**

PG&E Data Request No.:	CalAdvocates_011-Q007		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_011-Q007		
Request Date:	April 5, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-11
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DRU Index #:		Requester:	Pui-Wa LI

The following questions relate to your 2023-2025 WMP submission and also the following documents:

- PG&E's 2022 WMP, Section 7.1.E, Attachment 1 (Attch_Q3.pdf),
- PG&E's presentation during the 2021 EPIC Symposium (Attch_Q6_EPIC_Presentation.pdf),
- PG&E's Electric Preliminary Statement Part FY (Tariff Sheet No. 52259-E), and
- PG&E's Test Year 2023 GRC, Application 21-06-021, Exhibit PG&E-04 and Exhibit PG&E-17.

TOPIC: RAPID EARTH FAULT CURRENT LIMITER (REFCL)

QUESTION 007

PG&E presents during the 2021 EPIC Symposium (Attch_Q6_EPIC_Presentation.pdf) that "REFCL could be applied to approx. 80% of PG&E HFTD distribution circuit miles (3-wire circuits)."

However, PG&E's 2023 WMP, at page 275, states that:¹

While PG&E is looking at opportunities for REFCL deployments in our distribution substations to mitigate wildfire risk and evaluating combinations of REFCL with EPSS and other mitigations, implementing it would require significant and costly changes to the grid. Instead of making costly changes to the grid, we are moving forward with more cost-effective solutions such as DCD and Partial Voltage Detection.

Why did PG&E state that "REFCL could be applied to approx. 80% of PG&E HFTD distribution circuit miles (3-wire circuits)" while stating that "implementing it would require significant and costly changes to the grid"?

¹ PG&E's 2023 WMP, p. 275.

ANSWER 007

This distinction is based on the fact that REFCL is not a plug-and-play technology and requires supporting construction and equipment changes in the substation and on the distribution circuits to function. This is different from DCD and Partial Voltage Detection, which are software-based features on existing hardware and require significantly less cost to implement.