

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023-2025
Data Response

PG&E Data Request No.:	CalAdvocates_044-Q008		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_044-Q008		
Request Date:	April 15, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-08
Date Sent:	April 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

SUBJECT: EPSS AND PSPS

QUESTION 008

Figure ACI-PG&E-23-02-1 on page 40 of PG&E's 2025 WMP Update indicates that wildfire risk is approximately \$20,668 million, and PSPS and EPSS combined reduce the wildfire risk by approximately \$16.359 million.

- a) Has PG&E estimated the incremental wildfire risk *reduction* (in dollars) attributed to widescale deployment of REFCL? Please provide this estimate if yes.
- b) If the answer to part (a) is no, why has PG&E not conducted that analysis?
- c) Has PG&E estimated the incremental risk *increase* attributed to widescale deployment of REFCL? Please provide this estimate if yes.
- d) If the answer to part (c) is no, why has PG&E not conducted that analysis?
- e) Has PG&E estimated the incremental lifetime *expenditure* attributed to widescale deployment of REFCL? Please provide this estimate if yes.
- f) If the answer to part (e) is no, why has PG&E not conducted that analysis?

ANSWER 008

- a) No, PG&E has not estimated the incremental wildfire risk reduction (in dollars) attributed to widescale deployment of REFCL.
- b) This study has not been conducted because REFCL cannot be deployed widescale on PG&E's electric assets. REFCL can only be applied to substations that meet the following minimum requirements:
 - Single voltage 3-wire 12 kV substation;
 - At least 20 overhead miles in HFTD;
 - Less than 50% of circuit underground;
 - Less than 20% of circuit past autobanks; and
 - Sufficient physical space to deploy equipment.
- c) PG&E has not estimated the incremental risk increase attributed to widescale deployment of REFCL.

- d) Please see the response to subpart (b) above, as the reasoning is the same.
- e) PG&E has not estimated the incremental lifetime expenditure attributed to widescale deployment of REFCL.
- f) Please see the response to subpart (b) above, as the reasoning is the same.