

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

PG&E Data Request No.:	CalAdvocates_013-Q007		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_013-Q007		
Request Date:	April 6, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-13
Date Sent:	April 12, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Holly Wehrman

The following questions relate to your 2023-2025 WMP submission.

QUESTION 007

In section 7.2.1 on pp. 275-276 of PG&E's WMP, PG&E states,

“We determined that EPSS is more effective at mitigating wildfire risk at a lower cost as shown by comparing the RSEs for the two programs: at the time we filed the 2023 GRC, the RSE for EVM was 14.5 compared to the EPSS RSE of 105.7.”

- a) Other than RSE, what other criteria did PG&E evaluate in the decision to move away from EVM?
- b) EPSS is a reactive mitigation program in contrast to EVM which is proactive. Does this reactive vs. proactive categorization have any impact on PG&E's decision to transition away from EVM?
- c) How does PG&E's RSE estimate for EPSS take into account the negative reliability impacts on customers?

ANSWER 007

- a) There were several factors that we considered when deciding between the mitigation programs Enhanced Powerline Safety Settings (EPSS) and Enhanced Vegetation Management (EVM). Besides mitigation effectiveness and implementation and operating costs described by the Risk Spend Efficiency (RSE), we considered the faster pace of implementing EPSS compared to EVM, which results in faster risk reduction. The ability to expand EPSS across all circuits in the High Fire Threat Districts (HFTD), High Fire Risk Area (HFRA), and specific buffer areas quickly provides more immediate and ongoing operational mitigation benefits when compared to the individual miles of EVM scope executed each year.
- b) Our objective is to evaluate the effectiveness of minimizing catastrophic wildfires, regardless of whether mitigations are reactive or proactive. In fact, we do not use the labels “proactive” and “reactive” to categorize these mitigations. EPSS is better suited for managing overall risk because it more effectively mitigates multiple drivers of failure that could lead to an ignition, which ultimately reduces the chance of an ignition propagating into a catastrophic wildfire.

- c) The negative reliability impact to customers is captured as part of the Failure of Distribution Overhead asset risk. These impacts are detailed in A. 21-06-021, Exhibit (PG&E-4), Chapter 3, Figure 3-2 (below) in which PG&E showed the risk reduction of wildfire risk along with the negative impacts of reliability.

