

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

PG&E Data Request No.:	TURN_008-Q006		
PG&E File Name:	WMP-Discovery2023_DR_TURN_008-Q006		
Request Date:	April 24, 2023	Requester DR No.:	TURN-PG&E-8
Date Sent:	April 27, 2023	Requesting Party:	The Utility Reform Network
DRU Index #:		Requester:	Tom Long

**SUBJECT: RISK ANALYSIS**

**QUESTION 006**

SCE's WMP (R0), p. 252, states that: "SCE has determined that lines with covered conductor have a 90% risk in PSPS activations. When a circuit (or fully isolatable circuit segment) is all covered conductor, the de-energization threshold is increased to 40/58 mph (sustained wind/gusts)."

- a. Please provide any data, studies or reports in PG&E's possession that address whether lines with covered conductor have experienced a reduction in PSPS activations.
- b. Please provide any reports or studies in PG&E's possession that assess whether any de-energization thresholds should be changed for circuits (or portions thereof) with covered conductor.
- c. Does PG&E have plans to do any studies in the future to assess whether any de-energization thresholds should be changed for circuits (or portions thereof) with covered conductor? If so, describe what will be studied and the planned timing for the study or studies.

**ANSWER 006**

- a. We have not performed studies or have reports to support whether lines with covered conductors experienced a reduction in PSPS activations.
- b. We have not performed studies or have reports to support whether any de-energization thresholds should be changed for circuits (or portions thereof) with covered conductor. We currently do not plan on adjusting thresholds for circuits with covered conductors for the reasons stated in (c).
- c. As stated in response to ACI PG&E-22-31 in the 2023-2025 WMP, due to our PSPS modeling approach, we would not manually adjust our final PSPS risk thresholds to account for covered conductor or any other program that reduces the probability of catastrophic outcomes. Our Catastrophic Fire Probability model (discussed in Section 9) is a risk-based assessment of the probability of ignition given an outage multiplied by the probability of catastrophic fires (Fire Potential Index). Thus, we would not adjust the threshold at which PSPS is executed (each area is scoped for PSPS at the same risk threshold), but any program or external

factor that results in a beneficial outcome would reduce the probability of ignitions and therefore decrease the chance of achieving the PSPS threshold.

We do however, incorporate new outage data each year into our Outage Producing Winds (OPW) and Ignition Probability Weather (IPW) machine learning models. These updates account for any updated wind to outage to ignition responses in local areas of the grid. We are also exploring if adding covered conductor as a feature of the IPW model in future iterations provides benefits (see Objective SA-04).