

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_042-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_042-Q01		
Request Date:	February 21, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-08
Date Sent:	February 25, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Henry Burton

**SUBJECT: MULTI-ATTRIBUTE VALUE FUNCTION (MAVF) METHODOLOGY**

The following questions related to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

**QUESTION 01**

On page (p.) 52 of PG&E's 2021 WMP, Table PG&E-4.2-1 Key Components of MAVF lists the upper limit for the Electric Reliability attribute as 4 billion customer minutes interrupted (CMI). On p. 53, PG&E stated,

“The high end of the Electric Reliability Range (4 Billion CMI) was based on the most severe reliability impact from a single event of 3.6 billion CMI from the October 26, 2019 PSPS event.”

- a. Aside from the October 26, 2019 PSPS event, does PG&E have evidence that 4 billion CMI is a realistic upper estimate?
- b. Does PG&E plan to modify the range for the Electric Reliability attribute in the future?
- c. On p. 4 of its 2021 WMP, PG&E states that its PSPS events in 2020 were smaller and shorter than they would have been in 2019, given similar weather. How will PG&E use evidence from more recent PSPS events than 2019 to update this attribute in the MAVF in future years?

**ANSWER 01**

- a. PG&E expects the 4 billion CMI to continue to be a realistic upper estimate. This value is suitable to capture the upper range of reliability impacts for all risks presented in our 2020 Risk Assessment Mitigation Phase (RAMP) Report, including Wildfire. Based on the direction provided by the S-MAP Settlement Agreement (D.18-12-014) Revised Lexicon, which states that the “... *largest observable value is the high end of the range. Therefore, any Attribute level that results as a consequence of an event, or a risk mitigation action, or of doing nothing should be found within the range*” (definition of Range of the Natural Unit). Given that PG&E's service area is expected to be approximately of the same size in the foreseeable future, the upper range it established is still expected to be valid.

- b. PG&E will undertake a periodic review of its MAVF as part of the feedback received from its 2020 RAMP Report and may make modifications as warranted based on its findings.
- c. PG&E does not intend to lower the Electric Reliability upper range to reflect smaller and shorter outages observed in 2020 because, per the S-MAP Settlement Agreement (see Question 1a above), it should represent all conceivable consequence impacts, not just ones that are likely, or that pertain to a specific risk.