

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

PG&E Data Request No.:	WSD_010-Q03		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_010-Q03		
Request Date:	March 15, 2021	Requester DR No.:	WSD to PGE – Data Request – 20210315
Date Sent:	March 18, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

QUESTION 03

PG&E states in its 2021 WMP that its equipment and vegetation POI Models are trained on conductor failure related ignitions and vegetation ignitions (respectively) “ignitions limited to fire season events and CPUC reportable ignitions from 2015 to 2018 and tested using the 2019 ignitions.” (p. 100-101).

- a. Define what PG&E understands to be “fire season” for each year ignition data is used for.
- b. Explain why PG&E only utilizes events that occur during fire season, as opposed to year-round.
- c. A CPUC reportable ignition requires that “The resulting fire traveled greater than one linear meter from the ignition point” (p. 265) Explain why PG&E excludes from its data set events that traveled one linear meter or less from the ignition point.
- d. The above quote indicates that PG&E includes ignitions that have occurred in its entire service territory, not limited to HFTD or HFRA’s. Is this correct, or does two)?
- e. For the vegetation POI model, PG&E includes the statement in its WMP that “This data set includes all vegetation related outages that resulted in an ignition.” (p. 101) The equipment POI description does not include this statement.
 - i. Does the vegetation POI model include vegetation related outages that resulted in an ignition less than one linear meter or less from the ignition point?
 - ii. Explain any differences between what type of ignition is included in the vegetation POI model compared to the equipment POI model (aside from the source of the ignition).

ANSWER 03

- a. The 2021 Wildfire Distribution Risk Model defined fire season events as those that occurred from June 1st to November 30th, inclusive for each of the years. PG&E believes these dates are generally aligned with CalFire’s fire season declarations of summer and winter preparedness which are available at <https://www.fire.ca.gov/stats-events/>.

- b. The modeling task was to model ignitions that could become viable wildfires. At other times of year, there are vegetation-caused ignitions due to winter storms (either snow or rain) and vegetation itself is in different states of its annual cycle. Ignitions from within the fire season were selected to avoid training the model on ignitions from causes that are not viable during the fire season. In addition, the risk calculation multiplies the probability of ignition by the simulated consequence and those fire simulations use dangerous fire conditions from within the June to November fire season as their inputs. To be a valid calculation, the type of event the ignition probability model predicts should align with the type of event whose consequence was simulated.
- c. PG&E's basis for the model was CPUC reportable ignitions as defined by D.14-02-015 which specifies that a reportable fire travels greater than one linear meter from its ignition point. Non-CPUC reportable ignitions data was not readily available nor as well curated as the CPUC reportable ignition data set at the time of model construction. To the extent our CPUC reportable ignition data is updated, PG&E will use the updated data in future models.
- d. No, the 2021 Wildfire Distribution Risk Model is trained and tested only on CPUC reportable ignitions in the HFTD Tiers 2 and 3.
- e. PG&E clarifies that the quoted text is on page 102.
 - i. No, only CPUC reportable ignitions caused by vegetation within HFTD Tiers 2 and 3 during the June 1st to November 30th, inclusive fire season were considered (see also response to b above).
 - ii. See PG&E's response to WSD_010-Q2(b).