

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

PG&E Data Request No.:	SPD_004-Q006		
PG&E File Name:	WMP-Discovery2023_DR_SPD_004-Q006		
Request Date:	May 5, 2023	Requester DR No.:	SPD_PG&E_2023_004
Date Sent:	May 17, 2023	Requesting Party:	Safety Policy Division
DRU Index #:		Requester:	Henry Sweat

**SUBJECT: DATA SPD\_PG&E\_2023\_004 DUE FRIDAY 5/12**

**QUESTION 006**

Explain how the utility is normalizing for the effect of weather and fuel conditions when understanding its performance each year on ignitions relative to changing weather and fuel conditions year over year.

**ANSWER 006**

In general, we have been evaluating our performance metrics against indicators of elevated FPI days (e.g., R3 and above) for the last several years as well as red flag warning days.

To provide a more specific example, we are normalizing for weather in the EPSS effectiveness/performance in the following ways:

- For 2022, EPSS effectiveness was calculated by comparing the number of current-year ignitions that occurred while EPSS was enabled, divided by the average number of ignitions that occurred each year from 2018-2020 that would have met EPSS criteria using an FPI back cast.
- In order to normalize for variances in fire potential conditions (as quantified by the Fire Potential Index), ignition counts for each year are divided by the total number of "Circuit Mile Days" for the year.
- Circuit Mile Days are defined as the circuit miles in HFTD/HFRA for a circuit, multiplied by the number of days the circuit had EPSS activated (or would have met EPSS criteria). This calculation is performed for every day of the year, for every EPSS circuit, and added together to determine the total Circuit Mile Days for the year.
  - Note: If this calculation was performed mid-year, the normalization calculation was only performed through the target date used. E.g., if effectiveness was measured through 6/30/22, prior years would only be normalized by Circuit Mile Days through 6/30/18, 6/30/19, and 6/30/20 respectively.
- This calculation accounts for the increased fire potential risk exposure on the system for each year, using the same criteria used to determine when EPSS activation is appropriate.

$$\text{Circuit Mile Days} = \sum_{i=0}^n \text{Circuit Miles in HFTD/HFRA} \times \text{\# of Days EPSS Enabled}$$