

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

PG&E Data Request No.:	TURN_004-Q003		
PG&E File Name:	WMP-Discovery2023_DR_TURN_004-Q003		
Request Date:	April 12, 2023	Requester DR No.:	TURN-PG&E- 4
Date Sent:	April 17, 2023	Requesting Party:	The Utility Reform Network
DRU Index #:		Requester:	Tom Long

**SUBJECT: SYSTEM HARDENING**

**QUESTION 003**

Regarding PG&E's response to ACI PG&E 22-35, beginning on page 971 of its WMP:

- a. Please identify each mitigation discussed in PG&E's current WMP or its 2022 WMP that has the potential to mitigate the scale, scope, frequency, or duration of PSPS events.
- b. Please explain why Table 22-35-1 only looks at the impact of two mitigations, undergrounding and MSO, and does not consider the other mitigations identified in response to subpart (a).
- c. Please provide all PG&E analyses similar to what is presented in Table 22-35-1 regarding the impact on PSPS scale, scope, frequency, or duration of any or all of the other mitigations identified in response to subpart (a).
- d. Regarding the statement on page 971: "We concluded that none of the 2022 mitigation initiatives eliminated any event."
  - i. Please identify each of the "2022 mitigation initiatives" that are referenced in this statement.
  - ii. Is the meaning of this statement that none of the 2022 mitigation initiatives reduced the scale, scope, frequency or duration of any event? If not, please explain what is meant by the statement and how it relates to the analysis presented in Table 22-35-1.

**ANSWER 003**

- a. The 2022 WMP and 2023 WMP collectively discuss the following mitigations with the potential to mitigate the scale, scope, frequency, or duration of PSPS events:
  - Distribution Sectionalizing Devices
  - Transmission Line Sectionalizing or Switching
  - Distribution Line Motorized Switch Operator (MSO) Replacements
  - Temporary Distribution Microgrids
  - System Hardening (Distribution)
  - Undergrounding

- b. We currently do not have initiatives to add additional mitigation devices such as Sectionalizing devices and Temporary Microgrids as described in subpart (a). In each of the 2022 and 2023 WMP, we examined the projected impact of future *planned* mitigation initiatives on PSPS events. Thus, Table 22-35-1 only looks at the impact of the mitigation initiatives planned for future implementation in the 2023 WMP (undergrounding and MSO Replacements) and does not further examine the impact of past or pre-existing mitigations (including the additional mitigations discussed in the 2022 WMP).
- c. The analysis presented in Table 22-35-1 was only performed for the mitigation initiatives planned for implementation in the 2023 WMP: Undergrounding and MSO Replacements.

The combined or total impacts of the 2023 WMP mitigations is reflected in the following tables:

- Table PG&E-22-35-2: Target Reductions as a Result of PG&E's WMP Mitigations
- Table 7-3-2: PG&E's WMP Targets
- Targets PS-07
- QDR Table 10

The impact of the remaining mitigations identified in the response to subpart (a) on PSPS events were analyzed in the 2022 WMP, in the following tables:

- Table PG&E-8.1-1: Estimated Impact of 2022 WMP Planned Mitigations
- Table PG&E-8.3-1: PSPS Direct Impact Initiative Targets to be Completed by September 1, 2022
- Table PG&E-8.3-2: PSPS Direct Initiative Targets to be Completed After September 1, 2022 and Prior to the Next WMP Update

Furthermore, the combined or total impacts of the 2022 WMP mitigations is reflected in the following tables:

- Table PG&E-8.1-2: Estimated Total Impact of 2022 WMP Planned Mitigations
- QDR Table 11

- d.
  - i. This was a mistake we made in the 2023 WMP. This statement was intended to say: "We concluded that none of the mitigation initiatives described in this analysis will completely eliminate any event." The mitigation initiatives are referring to Undergrounding and MSO Replacement initiatives described in the 2023 WMP.
  - ii. This statement means that mitigation initiatives, Undergrounding or MSO Replacement, described in the 2023 WMP are not sufficient to completely eliminate or reduce the frequency of a PSPS event. However, they can reduce the scope and scale of a PSPS event in the lookback analysis performed for Table 22-35-1.