

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2022**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_025-Q06		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_025-Q06		
Request Date:	July 8, 2022	Requester DR No.:	CalAdvocates-PGE-NonCase-2022WMP-25
Date Sent:	July 13, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

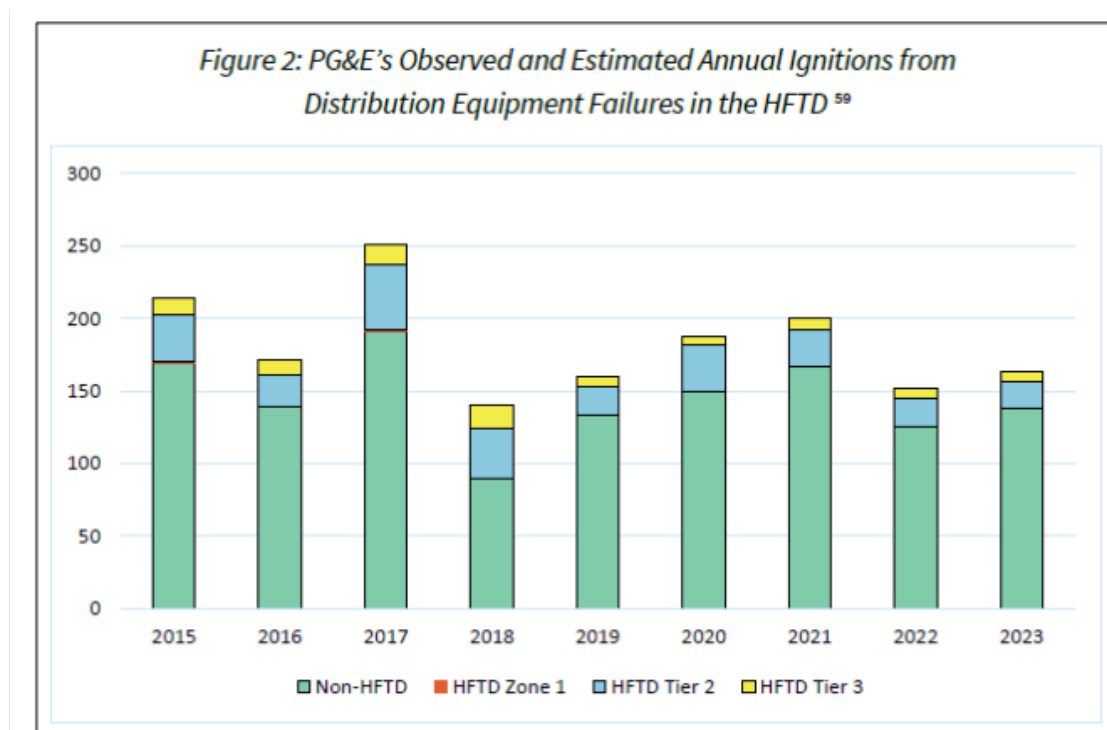
The following questions relate to PG&E's June 27, 2022 response to the *Revision Notice For Pacific Gas And Electric Company's 2022 Wildfire Mitigation Plan Update* issued by Energy Safety on May 26, 2022.

Questions 6-7 relate to PG&E's response to Critical Issue RN-PG&E-22-06.

**QUESTION 06**

Page 14 of PG&E's response states, "For clarification, the Revision Notice reference to increases in equipment-related ignitions from 2020 to 2021 refers to system-wide ignitions. However, in 2021, PG&E observed a 12.9% decrease in California Public Utilities Commission (CPUC)-reportable ignitions in HFTD areas where the suspected cause was PG&E equipment failure."

Page 16 of Energy Safety's Revision Notice includes the following chart, which shows a steady increase in non-HFTD ignitions from 2018 through 2021:



- a) Please list all causal factors to which PG&E attributes the increase in equipment-related ignitions from 2018 to 2021 in *non-HFTD*.
- b) Please list and briefly describe all actions PG&E is taking in 2022 to reduce the number of equipment-related ignitions in *non-HFTD*.

## ANSWER 06

- a) Given the relatively modest year-to-year changes from 2018 to 2021, we believe this annual increase is likely due to random year-to-year variability in the number of ignitions, and not necessarily be representative of an underlying trend. Indeed, when comparing the ignition counts for the other years in the dataset, PG&E observed less equipment-related ignitions on average in the three years after 2018 (123) than the three years preceding it (139), despite the consistent annual increase in ignitions from 2018 to 2021.

The two tables below detail equipment-related CPUC-reportable ignitions in non-HFTD areas by year and equipment type per the ignition data included in Table 7.2 of PG&E's most recent Wildfire Mitigation Plan (WMP) quarterly update. Table 1 is a count of ignitions from 2018 through 2021 while Table 2 is a count of the difference from the previous year. On Table 2, positive reductions between one year and the preceding year are highlighted in green and increases in ignitions are in orange. The more detailed numbers in these tables, particularly those in Table 2, indicate that changes in ignitions are likely the result of year-to-year variability, and not necessarily indicative of a causal trend.

**Table 1**

Count of Equipment Failure Ignitions in Non-HFTD by Year/Equipment Type	2018	2019	2020	2021
Capacitor bank damage or failure	5	7	7	4
Conductor damage or failure	27	61	49	51
Fuse damage or failure	2	5	7	7
Lightning arrestor damage or failure	1	3	1	1
Switch damage or failure	1	1	3	4
Pole damage or failure	7	6	8	8
Insulator and brushing damage or failure	4	3	4	2
Crossarm damage or failure	1	1	2	3
Voltage regulator / booster damage or failure	0	1	3	3
Recloser damage or failure	0	3	0	3
Anchor / guy damage or failure	1	0	1	1

Count of Equipment Failure Ignitions in Non-HFTD by Year/Equipment Type	2018	2019	2020	2021
Sectionalizer damage or failure	0	0	0	0
Connection device damage or failure	2	0	29	33
Transformer damage or failure	12	19	15	10

**Table 2**

Count of Equipment Failure Ignitions in Non-HFTD by Change from Previous Year	2018	2019	2020	2021
Capacitor bank damage or failure	5	2	0	-3
Conductor damage or failure	27	34	-12	2
Fuse damage or failure	2	3	2	0
Lightning arrestor damage or failure	1	2	-2	0
Switch damage or failure	1	0	2	1
Pole damage or failure	7	-1	2	0
Insulator and brushing damage or failure	4	-1	1	-2
Crossarm damage or failure	1	0	1	1
Voltage regulator / booster damage or failure	0	1	2	0
Recloser damage or failure	0	3	-3	3
Anchor / guy damage or failure	1	-1	1	0
Sectionalizer damage or failure	0	0	0	0
Connection device damage or failure	2	-2	29	4
Transformer damage or failure	12	7	-4	-5

- b) PG&E is focused on reducing equipment-related ignitions in HFTD as that is where we can most contribute to public safety and reduce wildfire risk. Indeed, 99% of our wildfire risk occurs in HFTD and HRFA areas. However, despite the lower risk profile, we still perform a significant amount of equipment-related fire mitigation work in non-HFTD areas. Specifically, we undertake Patrols Detailed Inspections, Infrared Inspections, and Intrusive Wood Pole Inspections in non-HFTD areas to ensure the integrity of our infrastructure. In addition to these inspections, we also perform maintenance tag work in non-HFTD areas, with tags being worked

according to risk-based priority, with each tag being assigned a priority code between A and H.

We also perform a large number of equipment-specific replacement programs in our non-HFTD areas such as pole replacement, pole restoration, overloaded pole replacement, overloaded transformer replacement, non-exempt surge arrester replacement, tree attachment replacement, and partial voltage detection installation. To supplement these equipment-specific programs, PG&E also performs routine vegetation management and animal abatement to minimize contact from object with PG&E assets in non-HFTD areas. Furthermore, in locations that have a heightened wildfire risk — namely the areas within High Fire Risk Area (HFRA) but outside HFTD and HFTD buffer zones — additional de-energization protection is implemented in times of elevated fire risk through our Enhanced Powerline Safety Settings (EPSS), and Public Safety Power Shut-off (PSPS) settings. We have found these programs to offer substantial wildfire mitigation, with EPSS in particular demonstrating an 80 percent reduction in CPUC-reportable ignitions in our 2021 pilot program.<sup>1</sup>

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<sup>1</sup> It should be noted that, due to the heightened fire risk, this program was piloted in HFTD areas and that the ignition reduction numbers may not be as substantial in non-HFTD areas given the overall reduced risk of ignitions of those areas.