

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigations Plans Discovery 2026-2028**  
**Data Response**

<b>PG&amp;E Data Request No.:</b>	SPD_004-Q017
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_004-Q017
<b>Request Date:</b>	May 1, 2025
<b>Requester DR No.:</b>	CONF-SPD-PGE-WMP2026-004
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	May 13, 2025

**SUBJECT: MITIGATION COST EFFICIENCY ASSESSMENT (SPD-PGE-WMP2026-004)**

**QUESTION 017**

In Question 1c of PG&E's data request response to titled WMP-Discovery2026--2028\_DR\_TURN\_002-Q001, PG&E said that "The inclusion of PICs results in an increased risk associated with customers in locations where PSPS thresholds were not met in our historical lookback, but have exposure to PSPS risk based on HFTD/HFRA location and system configuration."

- a. What does HFTD/HFRA location mean in this sentence?
  - i. Does PG&E mean that every customer living within the HFTD/HFRA was included in the historical lookback?
  - ii. Does this include customers who might be downstream of circuit segment that is exposed to PSPS risk?
- b. Define "system configuration".
- c. Include a list of the components that were considered within the "system configuration" and explain their relationship to PSPS thresholds.
- d. List each procedural step used to determine whether customers were exposed to PSPS risk based on HFTD/HFRA location and system configuration. Provide an explanation for each step.

**ANSWER 017**

- a. HFTD/HFRA refers to the applicable HFRA version at the time of the lookback analysis.
  - i. No. Customers living within the HFTD/HFRA were included in the Potentially Impacted Customers dataset, not in the historical lookback dataset. HFTD/HFRA customers included in the historical lookback dataset would have to have met the PSPS 5.0 Guidance threshold.
  - ii. Yes. Customers who might be downstream of a circuit segment in HFRA would be included.

- b. System configuration in this sentence refers to customers who might be physically located in non-HFRA but are included because they are downstream of a circuit segment in HFRA that would have been de-energized.
- c. Please see PG&E's response to subpart (b) regarding the definition of "system configuration" in this context. "System configuration" does not have "components" or impact on PSPS thresholds. PSPS thresholds may have an impact on which customers may be de-energized (in context of the historical lookback not PIC) due to system configuration.
- d. The process for PIC is the same process for historical PSPS lookback analyses, however, there is no PPS thresholds and the "weather polygon" is the latest approved HFRA version. Circuit segments that are within HFRA are included, as well as any downstream customers that would be affected by a de-energization. Any commonly used mitigations like microgrids and backfeeds, if applicable, would be assumed to operate, so those customers would be mitigated in the PIC dataset.