

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2023-2025
Data Response

PG&E Data Request No.:	SPD_024-Q001
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_024-Q001
Request Date:	January 9, 2025
Requester DR No.:	SPD_WSPS_PG&E_2025_001
Requesting Party:	Safety Policy Division
Requester:	Henry Sweat
Date Sent:	January 31, 2025

QUESTION 001

When reviewing PG&E's QDR submission, SPD identified that Ignition 20231165M was associated with three wires down records including Wire Down ID: 1882569, 1882568 and 1882578. SPD noted it appears the wires down was associated with three outages including Outage ID: 1882569, 1882578, 1882568. SPD noted a similar issue with Wires Down 507 which has two Object IDs 20018 and 20109. SPD is concerned that multiple wires down events are being reported for a single wire down event.

- a. Explain why it appears multiple wires down events are being reported for a single wire down event.
- b. If there is a discrepancy, send a corrected data set. Explain how the data was corrected.
 - i. If PG&E does not view this as a discrepancy –send an adjusted data set which only includes data for the wires down event closest to the actual wires event. Explain how the data was adjusted.
- c. Discuss if the apparent discrepancy will change the wires down data submitted as part of the Safety Operational Metrics (SOM) and Safety Performance Metrics (SPMs). Re-submit the data if it changes the data.
- d. SPD previously met with PG&E regarding apparent discrepancies between the reported wires down values in the QDR, SOM and SPM. SPD recalls some of the discrepancies may have been related to the date the data was pulled, but SPD recalls PG&E was planning to update the data sets.
 - i. Ensure the data sent in 1.b is updated based on PG&E's work updating the data sets.
 - ii. Submit the updated data sets to SPD.
- e. When PG&E records a wire down event, if all three phases are down, would PG&E record this as one event, or three events? Is the number of wires down tracked?

ANSWER 001

- a. We utilize our Integrated Logging Information System ("ILIS") to identify and calculate our wires down metrics. ILIS and Outage Events have been built to record outage information and customer details on the restoration process. The reporting structure for ILIS does not give single outage details for specific events. In most cases, wire downs will be over-reported due to this nature. The example above is a scenario where the initial outages were found to be due to unknown causes. Upon restoring power, another outage event occurred which resulted in the finding of a wire down event. The previous outages were changed from an unknown cause to a wire down event.

We identify and calculate our wires down metrics according to our procedure, TD-2200P-01 Atch. 2. Please see "*WMP-Discovery2023-2025_DR_SPD_024-Q001Atch01.pdf*." We currently believe we may be over-reporting this metric, and we are evaluating our practice and procedure to determine if changes to our calculation of this metric can be made to make this metric more accurate while also not under-reporting the number of wires down events.

Please let us know if you would like to meet to discuss this request and our processes for calculating wires down metrics. We would be happy to explain our processes and limitations with you, as well as how we developed our current approach to this metric.

- b. The discrepancy cannot be resolved via our current process for calculating this metric for all the outages due to limitations in our current technology. Each wire down event would need to be evaluated and investigated individually due to the method we use to calculate this metric, described in our response to subpart a, above. Given the many years of data that would need to be manually reviewed to make the QDR data align, PG&E objects to this request on the grounds that it is overbroad and unduly burdensome.
- c. We calculate the wire down metric in our Safety Operational Metrics (SOM) and Safety Performance Metrics (SPM) in the same way that we do our QDR, and that data is subject to the same limitations described in our response to subparts a and b, above. Given the many years of data that would need to be manually reviewed, PG&E objects to this request on the grounds that it is overbroad and unduly burdensome.
- d. The discrepancy that SPD previously discussed with PG&E in regards to differences in the QDR and SOMs is unrelated to this issue. The referenced discrepancy was related to differences in numbers between multiple reports and this was due to the timing of the data pull for the report. That discrepancy has been resolved. Please refer to our most recent QDR, SOM, and SPM submissions for updated data that addresses this discrepancy.
- e. We do not record each phase as individual wire down events. We do not track the number of phases that fall at a particular location.