

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

PG&E Data Request No.:	OEIS_012-Q03		
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Request Date:	April 29, 2022	Requester DR No.:	OEIS-P&GE-22-012
Date Sent:	May 4, 2022	Requesting Party:	Office of Energy Infrastructure Safety
PG&E Witness:		Requester:	Kevin Miller

SUBJECT: IGNITIONS

QUESTION 03

Regarding Table 7.2 from PG&E's 2022 WMP Update:

- a. Why does PG&E project an overall increase in ignitions from 2022 to 2023?
- b. Why does PG&E project a slight increase in overall ignitions for Tier 2 from 2022 to 2023?
- c. Why does PG&E project a sustained (no change) number of ignitions for Tier 3 from 2022 to 2023?
- d. Why does PG&E project a system-wide increase in ignitions from 2022 to 2023 for the following?
 - i. Vegetation contact;
 - ii. Capacitor bank damage or failure;
 - iii. Conductor damage or failure;
 - iv. Fuse damage or failure;
 - v. Lightning arrestor damage or failure;
 - vi. Switch damage or failure;
 - vii. Crossarm damage or failure;
 - viii. Recloser damage or failure;
 - ix. Connection device damage or failure;
 - x. Transformer damage or failure;
 - xi. Other equipment damage or failure; and
 - xii. Wire-to-wire contact.
- e. Why does PG&E project an increase in the number of ignitions at the transmission level within Tier 3 for other equipment damage or failure?

- f. Why does PG&E project a sustained (no change) number of ignitions at the distribution level within the HFTD from 2022 to 2023 for the following?
- i. Vegetation contact;
 - ii. Conductor damage or failure;
 - iii. Pole damage or failure;
 - iv. Crossarm damage or failure;
 - v. Connection device damage or failure;
 - vi. Transformer damage or failure; and
 - vii. Unknown.

ANSWER 03

- (a)-(f) In this response, PG&E provides the methodology used for projecting 2022 and 2023 ignitions in Table 7.2 to address Energy Safety's questions, including the subparts identified above.

For Distribution ignitions:

For Non-HFTD:

- The 2022 projections are the average of 2018, 2019 and 2020 ignitions
- The 2023 projections are the average of 2019, 2020, 2022 (projected) ignitions

Please note that 2021 data was excluded from both 2022 and 2023 projections to exclude any variability due to EPSS, which was originally targeted in HFTD areas but could have impacted non-HFTD and HFRA.

For all Tiers of HFTD, in the respective Tier:

- The 2022 projections are 71% of 2021 ignitions, based on modeling from a limited pilot of EPSS in 2021.
- The 2023 projections are unchanged from the 2022 projections.

For Transmission ignitions:

For both Non-HFTD and HFTD, in the respective Tier:

- The 2022 projections are the average of 2019, 2020 and 2021 ignitions
- The 2023 projections are the average of 2020, 2021 and 2022 (projected) ignitions

Using the above methodology, projected increases for some ignition drivers result from different years being used for the projections. For example, for distribution non-HFTD ignitions, the year 2018 drops out of the 2023 projection and is replaced by the 2022 projection, which has a higher number of incidents than 2018 for many of the ignition drivers. As a result, our 2023 projections are greater than the 2022 projections for those drivers.

The methodology described above is how we calculated 2022 and 2023 projections for the ignition drivers identified in Table 7.2 across our service territory. However, as described in the 2022 WMP, we are expanding the EPSS program in 2022 to all distribution circuits in HFTD and HFRA areas in our service territory, as well select non-HFTD areas. In 2021, EPSS was able to reduce CPUC-reportable ignitions by 80% on EPSS-enabled circuits. The 2022 EPSS program expansion will significantly increase the ignition risk reduction we can achieve. (See page 733 of the 2022 WMP.)