

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

PG&E Data Request No.:	CalAdvocates 029-Q007		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_029-Q007		
Request Date:	September 7, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-29
Date Sent:	September 27, 2023	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

This data request relates to PG&E’s 2023 WMP Revision Notice Response (henceforth referred to as “PG&E’s response”), filed August 7, 2023, in response to Energy Safety’s Revision Notice for PG&E’s 2023 WMP, and PG&E’s subsequent Reply Comments filed on September 1, 2023.

QUESTION 007

Page 2 of PG&E’s reply comments filed on September 1, 2023, state, “EPSS generally does not create outage events that would not have otherwise occurred. EPSS settings enable a line to trip more quickly than standard settings, but EPSS settings do not increase the number of outage events on their own.”

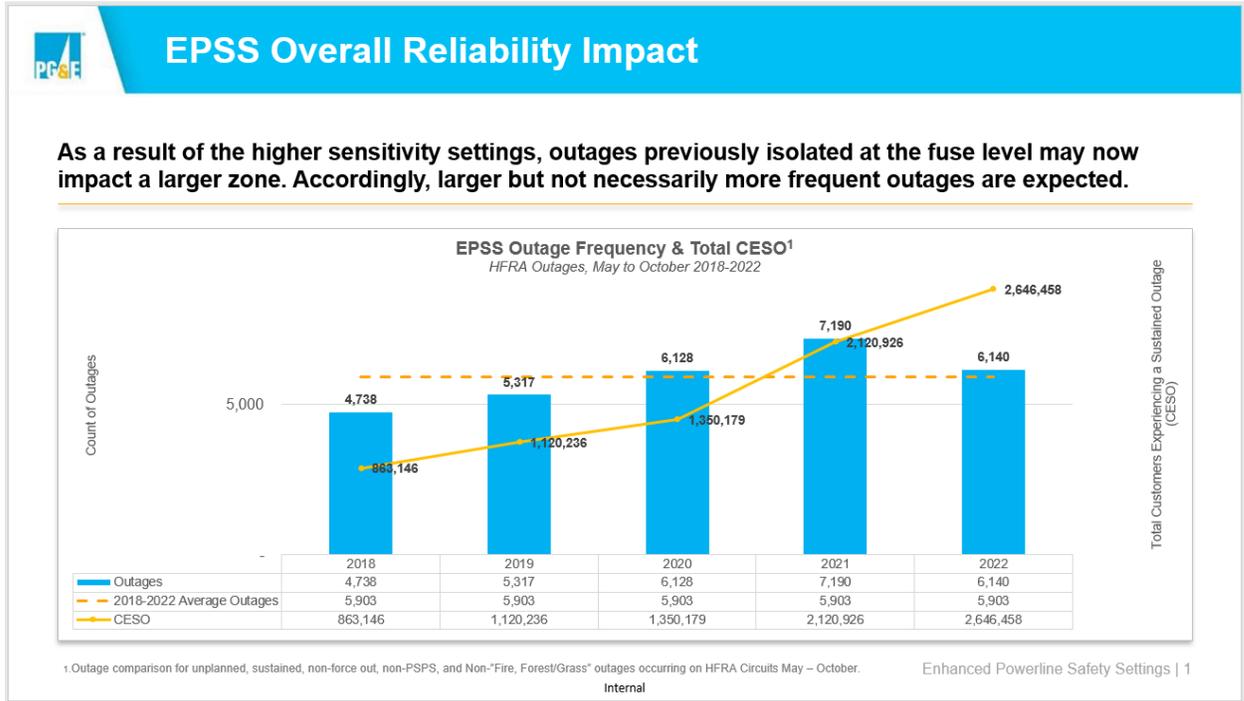
- a) Please state the basis for the above claim that EPSS generally does not create outage events that would not have otherwise occurred.
- b) Please provide any supporting studies, analyses, reports, or other documentation to support your response to part (a).

ANSWER 007

- a) To achieve EPSS’s ignition reduction benefit, EPSS protection settings are designed to provide (1) faster fault detection and clearing within 100ms, (2) reduced fuse single-phase operation, and (3) higher impedance fault detection. Accordingly, by definition our EPSS device protection settings must overreach smaller isolation zones on our circuits (such as fused taps) and detect faults beyond fuses and de-energize all three phases within 100ms when a fault is detected, such as a tree or branch coming into contact with our lines.

With EPSS active, outages that would otherwise occur but normally be isolated on smaller zones within our system (e.g., such as fused tap outage) may result in larger zone or circuit-level outages impacting a greater number of customers across a larger geographic area but not necessarily resulting in an increase in the number outage events. Accordingly, these outages generally would occur under normal operating conditions but be electrically isolated to smaller portions of our system. In a small number of instances, we have experienced “nuisance” outages related to switching activities associated with planned work. In those instances, we have protocols in place within our existing patrol and restoration procedures to expedite the restoration of those outages.

The number of outages in the HFRA from May to October decreased significantly from 2021 to 2022. Additionally, the number of outages in the HFRA during the same time period was only slightly higher in 2022 (6,140 outage events) than in 2020 (6,128 outage vents) before EPSS was enabled.



- b) Please see the graphic below showing two example fused taps that, when EPSS settings are enabled and a fault occurs downstream of either of the fuses, the system would de-energize to LR6 level as opposed to limiting the interruption to the respective fuses.

EPSS Example Circuit 1: ALPHA 1101

