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

PG&E Data Request No.:	CalAdvocates_027-Q03		
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Request Date:	July 20, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-27
Date Sent:	July 25, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

SUBJECT: PG&E's July 11, 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 2-3 relate to PG&E's response to Critical Issue RN-PG&E-22-03 (hereinafter PG&E's July 11, 2022 response).

QUESTION 03

Page 39 of PG&E's July 11, 2022 response states,

> "In order to focus undergrounding projects in locations to both address wildfire risk over the entire year and locations where wind driven events pose high wildfire risk, both the WDRM and PSPS models are referenced in identifying candidate miles for undergrounding."

Page 39 additionally states,

> "Other models, which are categorized as "Operational," such as PG&E's FPI and IPW Models, focus on informing day-to-day risk mitigation operations based on hourly weather forecasts, but only for a few days into the future."

Cal Advocates understands the phrase "PSPS models" to refer to these operational models, such as the FPI and IPW models.

a)   Is the understanding stated above correct? If not, please correct any errors in this understanding.

b)   If the understanding stated above is correct, please explain how these operational models, which inform day-to-day mitigation operations, are able to inform candidate miles for undergrounding.

c)   Please explain how PG&E used its PSPS models to identify its 2022 candidate miles for undergrounding.

d)   Please explain how PG&E used its PSPS models to identify its 2023 candidate miles for undergrounding.

ANSWER 03

a)   PSPS models includes operational models, such as the FPI and IPW models, as

well as model outputs against historical weather events, referred to as the PSPS Historical Lookback, to support the selection of candidate miles for undergrounding.

b) The PSPS Historical Lookback is meant to represent a backcast of the PSPS impact based on historical weather events with the PSPS protocols at the time of the backcast. As such, it represents a wider consideration of potential PSPS impacted locations to inform candidate miles for undergrounding.

c) PG&E used the 10-year PSPS historical lookback, which used the 2020 PSPS protocols against a back of 2010-2019, to inform candidate miles for undergrounding in 2022. PG&E used its PSPS models to identify locations that are frequently impacted, or high customer count impacted as candidate miles for undergrounding.

d) PG&E used both the 10-year and 11-year PSPS historical lookback (which used the 2021 PSPS protocols against a back of 2010-2020) to inform candidate miles for undergrounding in 2023. PG&E used its PSPS models to identify locations that are frequently impacted, or high customer count impacted as candidate miles for undergrounding.