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

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PG&E Witness:		Requester:	Joseph Mitchell

FN60 - When PG&E conducted the EASOP analysis, our PSS team members reviewed each system hardening project during the scoping process to determine if ingress/egress issues existed at the site. Given the time and effort required to repeat this type of analysis, PG&E is instead using a PSS proxy in this alternatives analysis. In place of a PSS team member reviewing each of the 2023- 2024 project sites selected by WDRM v3, PG&E is using the PSS score for each circuit and applying it to each segment on that circuit. If the PSS score for a circuit is high (score = 105), then the model considers there to be an ingress/egress risk on each of the segments that make up that circuit.

QUESTION 003

How representative is the proxy PSS score of the entire circuit? Specifically,

a. How many hardening projects are there per circuit? Provide a distribution if possible.
b. What fraction does the hardening project typically take up of the circuit? Provide a distribution if possible.
c. Show how EPS scores are determined and how these compare against WDRM v3.
d. Is PSS ingress/egress scoring used as an element incorporated into the risk model or is it used as an independent decision tree branch point?
e. What fraction of undergrounding projects rely on PSS ingress/egress scores to make the determination to underground?
    i. Provide the fraction for cases where it was the only/primary determinant and
    ii. Provide the fraction for cases where PSS ingress/egress was only one of many factors used in the determination to underground.

ANSWER 003

a. The number of hardening projects per circuit varies depending on the length of the circuit, the number of circuit protection zones on the circuit, the load, and the needs of the circuit. There is no average distribution. Please note that the PSS score is not the sole driver for any mitigation decision and is only a driver for the inclusion of a circuit segment to be included in the portfolio. A more detailed PSS review is

concluded within the scoping process to understand the specific needs within a project.

b. The portion of the circuit taken up by a hardening project varies by circuit and depends on the risk distribution within the circuit and the needs of the circuit. There is no average distribution. CPZ system hardening projects can range from less than 1 mile to more than 50 miles. The decision for specific mitigation alternatives is typically made at a sub-project level. Because of this, a percentage of the circuit in a hardening project is not useful in this determination of the value of the PSS score.

c. PG&E assumes this question is referring to the PSS score. PSS scores are the output from a PSS Circuit Based Risk Assessment. A copy of the PSS assessment form, score sheet, and risk matrix is attached "*WMP-Discovery2023_DR_MGRA_007-Q003Atch01.xlsx*". In response to Question 1 of this data request, PG&E provided the qualifications for our PSS team members. Only select PSS team members were qualified by PG&E's Wildfire Governance Council to perform the PSS Circuit Based Risk Assessments. To perform an assessment, a PSS must have:

    - Minimum of 20 years of education, training, and experience in wildfire incident response.
    - Knowledge base including fire behavior, prevention standards, suppression tactics and strategies, all risk emergency response, command and control, and complex incident management.
    - Each evaluator has functioned as a Chief Officer within California Professional Wildland Firefighting Agencies.
    - Experience as members of a Local, State, or Federal Incident Management Teams.

    PSS scores do not compare to WDRM v3 risk scores. The PSS score was used as a supplemental review of risks that were not identified by or quantified by WDRM v2.

d. The PSS score is an independent element. The PSS score was used to advance work into the portfolio when the location was not also the highest risk in the WDRM risk model, but the location was understood to be high risk by our wildfire mitigation experts. A separate PSS evaluation for each project would be completed as part of the scoping process and was included as one element on the decision tree.

e. PSS ingress/egress recommendations were one of several elements discussed as part of the system hardening mitigation decision. While it is possible that ingress/egress concerns may have been a determining factor for some projects on individual portions of a circuit segment, other factors were reviewed and considered such as PSPS impact and tree fall-in risk for each project as well.

    i. Because each project is reviewed for a variety of factors information about the fraction of cases where a PSS ingress/egress score was the primary determinant is not centrally tracked and not readily available among PG&E's thousands of system hardening projects.

    ii. Similar to the response to subpart e.i.,information about the fraction of cases where PSS ingress/egress was only one of many factors used in the determination to underground is not readily available among PG&E's

thousands of system hardening projects. However, it is accurate that to say on all projects PSS ingress/egress was only one of many factors reviewed during the determination to underground or deploy other wildfire mitigation methods.