

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

PG&E Data Request No.:	OEIS_010-Q02		
PG&E File Name:	WMP-Discovery2022_DR_OEIS_010-Q02		
Request Date:	April 15, 2022	Requester DR No.:	Data Request OEIS-PG&E-22-010
Date Sent:	April 20, 2022	Requesting Party:	Office of Energy Infrastructure Safety
PG&E Witness:		Requester:	Kevin Miller

SUBJECT: COMMUNITY WILDFIRE SAFETY PROGRAM PROJECT PRIORITIZATION

QUESTION 02

Regarding PG&E's attachment CONFIDENTIAL_PGE_2022-WMP_Section_46_Remedies_2114_Atch01_CONF to the 2022 WMP Update:

- a. Concerning the project type "Community Wildfire Safety Program for projects aimed for 2022-2023":
 - i. Describe this project type, including where more information about this project type is described within the 2022 WMP (or previous WMPs, if applicable).
 - ii. How were the projects that fall under this project type selected and prioritized?
 - iii. How does this project type overlap and/or align with risk model output?
 - iv. Provide a percentage of projects under CWSP that align with the top 20% risk score output from the 2021 Wildfire Distribution Risk Model
- b. How does this project type differ from the following: Top 20% MAVF CPZ, Top 250 miles, and Top 50 Miles? Currently, this data is showing around 0.82 miles planned for undergrounding in 2024.
 - i. Is this still accurate?
 - ii. If not, provide the updated mileage.
 - iii. If so, when does PG&E intend to select locations for additional undergrounding miles?
 - iv. If locations are not currently selected, how is PG&E planning on expediting undergrounding for completion in 2024?
 - v. Are the locations for grid hardening, as a whole, selected for 2024 (i.e., know the hardening location, but don't know the hardening initiative that will be used, UG vs. OH)?
 - vi. If so, is it possible to provide an amended response including these projects?

ANSWER 02

a.

- i. The project type “Community Wildfire Safety Program for projects aimed for 2022-2023” represents projects that were selected based on the 2021 WDRM v2 model. During PG&E’s scoping process for 2021-2023 system hardening projects, PG&E first reviewed the circuit segments based on the Top 50 miles, Top 250 miles and Top 20% MAVF (previous in-flight projects) to develop the 2021-2023 workplan. After completing these analyses, PG&E began reviewing larger circuit segments or whole circuits, informed by the 2021 WDRM v2, including by incorporating other operational considerations like adjacent circuit segments, to select the next population of system hardening projects. These projects were labeled with the “CWSP 2022-2023” label. Thus, the primary difference between the labels “Top 50 miles”, “Top 250 miles” or “Top 20% MAVF” and “CWSP 2022-2023” is timing: the “CWSP 2022-2023” projects were identified and scoped during a later round of scoping, but they are otherwise very similar to the system hardening projects with those other labels. General information regarding Distribution System Hardening work and planned projects can be found in the 2022 WMP in Section 7.3.3.17.1 and in response to Remedy PG&E-21-14.
- ii. As described in the response to a.i. above, these projects were selected based on the 2021 WDRM v2 (largely in the Top 20%) in conjunction with operational factors like adjacent planned work.
- iii. The risk model output informed the selection of these “CWSP 2022-2023” projects as we primarily reviewed the Top 20% of that risk model in developing these projects. See the response to a.iv. below for the details of the overlap between the Top 20% and these “CWSP 2022-2023” projects.
- iv. In the column W of the referenced attachment (CONFIDENTIAL_PGE_2022-WMP_Section_46_Remedies_2114_Atch01_CONF), entitled “2021 Risk Score”, a risk score of 1 – 726 denotes circuit segments in the top 20% of the 2021 WDRM v2 risk model (because the highest risk circuit segment is 1 and the cutoff for the top 20% of circuit segments is number 726). Of the 532.8 total forecasted miles for the years 2022-2024 with a “CWSP 2022-2023” label, 494.3 miles, or 92.8%, are in the Top 20% of the 2021 WDRM (as those 494 miles have a circuit segment risk rank between 1 and 726).

- b. As discussed in response to a.i above, during PG&E’s scoping process for 2021-2023 system hardening projects, PG&E first reviewed the circuit segments based on the Top 50 miles, Top 250 miles and Top 20% MAVF to develop projects. After completing these analyses, PG&E began reviewing larger circuit segments or whole circuits, informed by the 2021 WDRM, including by incorporating other operational considerations like adjacent circuit segments, to select the next population of system hardening projects. These projects were labeled with the “CWSP 2022-2023” label. Thus, the primary difference between the labels “Top 50 miles”, “Top 250 miles” or “Top 20% MAVF” and “CWSP 2022-2023” is timing: the “CWSP 2022-2023” projects were identified and scoped during a later round of scoping but they are very similar miles and, as identified in the response to a.iv. above, 93% of the “CWSP 2022-2023” projects are in the Top 20% of the 2021 WDRM as well.

- i. The data in the referenced attachment from Remedy 21-14 (CONFIDENTIAL_PGE_2022-WMP_Section_46_Remedies_2114_Atch01_CONF) is from the end of January 2022. As of today, there are ~20 miles of undergrounding scoped for 2024. PG&E has recently reviewed and approved, through the Wildfire Risk Governance Steering Committee, the 2022 WDRM v3 that will be used for circuit segment selection for 2024 undergrounding. Now that this model is available, we will be working to scope the additional miles required to fill the 2024 project pipeline and produce a high number of contingency miles that may replace those miles that experience significant dependency challenges. PG&E expects to start scoping additional 2024 projects to start building that workplan in May 2022.
- ii. See the response to b.ii above. As of April, PG&E has developed ~20 incremental miles of undergrounding for 2024 but has not materially started scoping 2024 undergrounding projects.
- iii. See the response to b.i above.
- iv. See the response to b.i above regarding the timing for scoping 2024 undergrounding projects. As discussed in Section 7.3.3.16 of the 2022 WMP, PG&E is developing several strategies to ramp up our execution of undergrounding work to support the increased undergrounding goals in 2022, 2023 and 2024. Some of these strategies include: using skilled and qualified internal and external resources to complete the work and scale the program, in partnership with represented labor partners; looking at opportunities to update, design and construction standards and work process improvements; proactively managing supply chain issues to mitigate current risks associated with global supply chain issues; working to develop alternative solutions that meet our business requirements; and working to expand the supplier base for materials.
- v. PG&E's project selection and scoping process generally identifies the future asset type (hardened overhead or underground) around the same time that the project is scoped. Therefore, as discussed in the response to b.i above, PG&E has not materially started scoping system hardening projects for 2024. That work will begin in May 2022.
- vi. N/A, per the response to b.v.