

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

PG&E Data Request No.:	OEIS_016-Q02		
PG&E File Name:	WMP-Discovery2022_DR_OEIS_016-Q02		
Request Date:	August 9, 2022	Requester DR No.:	OEIS-PG&E-22-016
Date Sent:	August 12, 2022	Requesting Party:	Office of Energy Infrastructure Safety
PG&E Witness:	Paul McGregor	Requester:	Kevin Miller

SUBJECT: BURN SCAR RISK MODELING

QUESTION 02

During a call with Energy Safety on August 3, 2022, PG&E discussed using pre-fire vegetation levels for fire burn scars.

- a. Describe why PG&E made these choices for determining ground fuels layers as inputs in its wildfire risk modeling.
- b. Provide a list of the associated CPZs that fall under these areas within Attachment 2022-07-26_PGE_22-04_RNR_R3_Atch01CONF.

ANSWER 02

- a. As described in PG&E's 2022 WMP in section 4.5.1(d) Wildfire Consequence Model, the switch to a 2030 forecasted fuels layer was based on the view that pre-fire vegetation levels best represent the long-term ground fuel potential.

"For long term risk assessment, PG&E utilized a projected fuel layer for the year 2030 that was provided by Technosylva. The intent is that the planning model is used to make longer-term decisions to reduce risk and we wanted to capture the potential future state of the fuels. Technosylva utilized their expertise in vegetative re-growth after fire disturbances (fire scars) to project the state of the fuels in 2030. This work leverages historical data on vegetation regrowth after fires based on satellite data and burn severity maps."

This decision was made in consultation with our Wildfire propagation and consequence modelling provider, Technosylva. Technosylva provides a fuels data updating subscription used by PG&E and other IOUs that ensures surface and canopy fuels data is kept up to date during the calendar year. This is important to ensure daily fire behavior and risk analysis is accurate. This typically involves updates pre-season (July), post-season (December), and regular updates during fire season based on the frequency of large wildfires. Pre and Post season updates include incorporating new data sources, such as LiDAR and other imagery, available from both public and commercial sources. Updates conducted during fire season utilize high resolution imagery sources to conduct burn severity mapping to provide fuels updates for burn areas.

SCE has also adopted the use of a 2030 forecasted fuels layer. From SCE 2022

WMP, page 30, Table SCE-4.1, under Risk Assessment and Mapping – Additional Weather Scenarios and Granular Fuel Data:

“In the prior version of the Technosylva Wildfire Risk Reduction Model (WRRM), SCE utilized 41 weather scenarios. Similarly, SCE used fuels data accounting for present fuel conditions. SCE determined that a wider range of both fuel and wind driven conditions was needed for its risk modeling. In 2021, SCE added an additional 400+ weather scenarios to better represent a wider range of both fuel and wind driven fire conditions. Similarly, SCE incorporated a more granular fuel model to account for fuel regrowth in recently burned locations with fuel regrowth projected out to the year 2030.”

- b. Filtering Column B of Attachment 2022-07-26_PGE_22-04_RNR_R3_Atch01CONF for Community Rebuild and Fire Rebuild undergrounding projects identifies CPZs in fire burn scar areas. The V3 risk rankings for these CPZs are influenced, in part, on the forecasted 2030 fuels layer based on pre-fire vegetation levels. Providing the names of additional CPZs in the attachment that were previously impacted by recent fires, and were risk ranked using the 2030 forecast fuels based on pre-fire vegetation levels in V3 of the WDRM, will require additional fire scar and fuels forecast data from Technosylva and a manual review of each identified CPZ. We will contact Energy Safety to discuss options for addressing this request and providing the additional information, if needed.