

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

PG&E Data Request No.:	SPD_006-Q001		
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Request Date:	May 17, 2023	Requester DR No.:	Data Request SPD_PG&E_2023_006
Date Sent:	May 22, 2023	Requesting Party:	Safety Policy Division
DRU Index #:		Requester:	Kevin Miller

SUBJECT: FOLLOW UP TO 5/3 MEETING ON UNDERGROUNDING RISK EFFECTIVENESS

QUESTION 001

After it was pointed out by SPD that there appeared to be a discrepancy in the methodologies used to calculate the risk mitigation effectiveness of EPSS, Undergrounding and Covered Conductor (CC), PG&E stated that CC is probably the most “mature” mitigation effectiveness as the effectiveness based on empirical data and cross utility collaboration, EPSS is the second most as it is based on empirical data, and that UG is the least mature mitigation effectiveness as its based purely on SME judgement. PG&E agreed to update its undergrounding mitigation effectiveness percentage calculation to account for secondary/service drop ignitions.

- a. Provide this analysis or provide an update on when this analysis will be finished and submit the analysis when it is finished.

ANSWER 001

PG&E notes that the calculation of risk mitigation effectiveness can be computed in various ways, and taking different approaches to calculate effectiveness for different mitigations does not necessarily constitute a discrepancy. The mitigation effectiveness calculation for covered conductor was articulated as being the most “mature” because the joint IOUs agreed upon a common methodology of using a combination of estimated effectiveness based on SME input against historical data and recorded effectiveness based on analysis of overhead hardened locations across multiple years of installation.

At this time, the mitigation effectiveness estimate for undergrounding is considered the least “mature” because there is not a common approach employed by the joint IOUs, and none of the utilities have yet deployed undergrounding as a wildfire mitigation measure on a large scale. As a result, PG&E’s wildfire risk effectiveness assessment for undergrounding is predominantly SME-informed and was validated when reviewing the ignition rate per mile for overhead and underground circuits.

PG&E is currently developing an updated wildfire mitigation effectiveness analysis for undergrounding in HFTD or HFRA areas, including to account for the impact of secondary lines and service drops, for inclusion in its SB-884 10-Year Undergrounding Plan filing, which PG&E is preparing to file in 2023. PG&E anticipates the analysis will be complete and validated in 2023 and included in the filing of PG&E’s 10-year Undergrounding Plan.