

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	WSD_012-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_012-Q01		
Request Date:	March 24, 2021	Requester DR No.:	WSD 07 Email transmittal
Date Sent:	March 26, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

**SUBJECT: RE: WMP - DATA REQUEST - DUE MARCH 26, 2021 - PG&E**

**QUESTION 01**

Regarding PG&E's High Fire Risk Areas (HFRA):

- a) Does PG&E intend to submit a petition to modify the High Fire Threat Districts (HFTD) to include PG&E's HFRAs? If so, provide a timeline for when PG&E plans on filing.
- b) In the breakdowns between non-HFTD and HFTD presented in Tables 1 through 12, how does PG&E categorize its HFRA outside of HFTD? If HFRA is considered non-HFTD, provide additional columns for Table 7.2 and Table 12 breaking out HFRA.
- c) What percentage of Circuit Protection Zones (CPZs) fall partially or fully within HFRAs respectively? Provide the number of CPZs and circuit miles.
- d) Have any CPZs fully or partially within HFRAs been prioritized for work in 2021 or 2022? If so, provide the number of CPZs and circuit miles, along with a description of work being completed.

**ANSWER 01**

As mentioned in the 2021 Wildfire Mitigation Plan (WMP), we have developed the High Fire Risk Area (HFRA) for the primary use of scoping PSPS events. See 2021 WMP at pp. 85-89. The HFRA includes the HFTD Tier 2 and Tier 3 areas plus additional areas PG&E has identified as having a potential for catastrophic wildfires. Up to this point, the HFRA has primarily been used for PSPS scoping and has generally not been leveraged to inform, analyze, or target other Wildfire related mitigation work (namely in the "non-HFTD HFRA" areas outside of Tier 2 and Tier 3 that the HFRA has identified as higher risk). Additionally, PG&E's HFRA analysis remains a work in progress with further development, review, and modifications possible in the coming months.

With this context, our answers are provided below:

- a) We do not plan to file a petition with the CPUC to modify the HFTD at this time.

- b) Areas outside of HFTD that have been identified as HFRA through our analysis to date (AKA “non-HFTD HFRA”) were characterized as non-HFTD in our 2021 WMP submission and associated tables. However, as discussed above, given the ongoing process of developing the HFRA, and the applicability of the HFRA primarily to the PSPS program, we have not yet performed an analysis of the non-HFTD HFRA areas across other initiatives (as would be necessary to break out “non-HFTD HFRA” for Table 12) and processes (like ignition tracking, as we would need to do to update Table 7.2). Therefore, we do not currently have the requested information available.
- c) As discussed above, the HFRA analysis has been leveraged primarily for the PSPS program to date. It has not been leveraged to inform an expanded scope or prioritization of the majority of the WMP initiatives. However, we have analyzed which of the circuit segments (or CPZs) in our 2021 Wildfire Distribution Risk Model overlap with the non-HFTD HFRA areas. The summary information is that:
- 200 of 11,106 (1.8%) total distribution overhead circuit segments (CPZs) in the 2021 Wildfire Distribution Risk Model overlap, at least partially, with the non-HFTD HFRA areas.
  - 621 of 81,001 (0.8%) total distribution overhead miles of circuit segments (CPZs) in the 2021 Wildfire Distribution Risk Model fall within non-HFTD HFRA areas. [Note: This mileage is just the portion of the circuit in the non-HFTD HFRA area, not the total circuit segment. Total circuit segment lengths are provided in the table below.]

In performing this analysis, each location in our service territory has been defined as being in only one of three categories:

1. HFTD – CPUC-defined HFTD area
2. Non-HFTD HFRA – these are locations that are outside of the CPUC-defined HFTD but that have been identified as having a potential for catastrophic wildfires through our HFRA analysis
3. Non-HFRA – these are all locations outside of either the CPUC-defined HFTD and PG&E’s identified Non-HFTD HFRA areas

We analyzed which circuit segments touch these different locations and categorized each circuit segment based on if it overlaps with each area. This information is summarized in the following table<sup>1</sup>:

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<sup>1</sup> This analysis included all overlaps, even very small portions of a circuit segment. Therefore, a circuit segment could be 99% in HFTD and only 1% in non-HFRA and it would be included in category C, Partial HFTD (#1) & Partial Non-HFRA (#3).

Category	Circuit Segments	Circuit Miles in these CPZs
A. Fully in HFTD (#1)	1,287	13,271
B. Partial HFTD (#1) & Partial Non-HFTD HFRA (#2) (All HFRA)	38	532
C. Partial HFTD (#1) & Partial Non-HFRA (#3)	2,119	18,479
D. Partial HFTD (#1) & Partial Non-HFTD HFRA (#2) & Partial Non-HFRA (#3)	104	1,226
E. Fully Non-HFTD HFRA (#2)	6	110
F. Partial Non-HFTD HFRA (#2) & Partial Non-HFRA (#3)	52	750
G. Fully Non-HFRA (#3)	7,500	46,632
<b>Total</b>	<b>11,106</b>	<b>81,001</b>

- d) As discussed in PG&E's 2021 WMP, at pages 586, 589 and other locations, PG&E is incorporating the non-HFTD HFRA locations into our 2021 and 2022 asset inspection plans at the rate of inspecting the electric transmission and distribution assets in these areas on a three-year cycle, roughly equivalent to 33% being inspected each year. Over a three-year period, all assets, which is equivalent to portions of 200 circuit segments and the 621 circuit miles noted above, in the non-HFTD HFRA areas will be inspected. Beyond the asset inspection program, other WMP initiatives have not been targeted to complete work in the non-HFTD HFRA areas, in alignment with the discussion above that the HFRA analysis has been leveraged primarily for the PSPS program to date.