

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

PG&E Data Request No.:	CalAdvocates_057-Q02		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_057-Q02		
Request Date:	June 10, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-23
Date Sent:	June 15, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan – Revised, submitted June 3, 2021.

QUESTION 02

In response to Remedy 1b of Critical Issues PGE-02, PG&E describes an external review performed by E3, which occurred from March 2021 through May 2021.¹

- a) Please explain why PG&E did not retain E3 to perform this independent review until March 2021.
- b) Please state the basis for using the 2021 Wildfire Distribution Risk Model to prioritize 2021 WMP work prior to beginning the external validation review.

ANSWER 02

- a) From November 2020 to February 2021, which included several holiday periods, the contract for the validation work with E3 was being negotiated, drafted, finalized, and executed.
- b) In 2020, the 2021 Wildfire Distribution Risk Model was approved by the Wildfire Risk Governance Steering Committee for use. This approval was not contingent on the results of an external validation. PG&E is not aware of any regulatory or legal requirements for external validation of a model before it can be used for work planning. In our 2021 WMP, submitted on February 5, 2021, we stated:

PG&E is currently contracted Energy and Environmental Economics, Inc. to perform a review and validation of the modeling methodology, code, model results and application to be completed in the spring 2021. (Original 2021 WMP, p. 139).

We are not aware of Cal Advocates raising in its comments on the 2021 WMP a concern about the timing of the external validation or arguing that we should not proceed with 2021 workplans while the 2021 Wildfire Distribution Risk Model was being validated. In addition, it was necessary to proceed with the 2021 work planning process while the model was being validated.

¹ PG&E's 2021 Wildfire Mitigation Plan – Revised, p. 154.