

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

PG&E Data Request No.:	CalAdvocates_057-Q05		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_057-Q05		
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 05

The external validation report prepared by E3 states, in part,

In spite of the importance of consequence scores to risk scores, our review of the Wildfire Consequence Model is limited. The single most important component of the consequence model is the fire simulation software itself. Review of the Technosylva fire simulation approach was not included in the scope of our review, as this review should only be appropriately performed by forest fire experts.¹

- a) Has PG&E retained “forest fire experts” to validate the Technosylva model?
- b) If the answer to part (a) is yes, please name the forest fire experts—or the organization(s) to which they belong—and provide any validation report that has been produced.
- c) If the answer to part (a) is no, please explain why not.
- d) Has PG&E retained any external consultant to perform a validation review of its updated 2021 Wildfire Consequence Model?
- e) If the answer to part (d) is yes, please name this consultant(s) and provide any validation report(s) that has been produced.
- f) If the answer to part (d) is no, please explain why not.

ANSWER 05

- a) No, forest fire experts have not been retained by PG&E to validate the Technosylva model or toolkit. Technosylva has several internal fire behavior experts that test and validate the Wildfire Analyst Enterprise models on a regular basis. This includes five PhDs who specialize in fire behavior analysis as part of their Science & Engineering team. In addition, the Technosylva Wildfire Analyst Enterprise product is used daily by CAL FIRE for each wildfire incident across the state since September 2019. This includes the entire 2020 fire season. Working

¹ Attachment 2021WMP_Revision_PGE-01_Atch01, p. 38.

with CAL FIRE's FBAN team, validation and calibration of the Wildfire Analyst Enterprise model occurred, primarily using the FireGuard observation data that provides "affected areas" every 15 minutes during incidents. This data has been integrated with the Wildfire Analyst Enterprise model to calibrate the Rate of Spread (ROS) factors to match what is observed. This process has been on-going since July 2020.

- b) As mentioned in the response to part a, PG&E has not directly retained 'forest fire experts' to validate the Technosylva model or toolkit but, the on-going validation being performed by the CAL FIRE FBAN team mentioned in part a is lead at CAL FIRE by Geoff Marshall. As part of this cooperation, validation reports were created by Technosylva for CAL FIRE that demonstrate the integration and calibration of the FireGuard data with the Wildfire Analyst Enterprise model. However, at this time the FireGuard data is reserved for official use only by the Federal and State agencies, so Technosylva is unable to share these. It is understood that PG&E has confirmed with the NIFC lead that access to FireGuard is now permitted. We are confirming with CAL FIRE that they are willing to share these reports before we can provide.
- c) N/A
- d) PG&E has not retained external consultants to perform validation beyond the validation activities described the response to parts a and b by CAL FIRE and Technosylva.
- e) N/A
- f) We note that there are several ongoing efforts to standardize wildfire risk model development including the recent identification of Green Grid by WSD as their Compliance Insurance Contractor. PG&E is supportive of these efforts and hopeful that they will provide improvements in tools and methods to determine the precision of fire simulations tools such as Technosylva.