

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

PG&E Data Request No.:	CalAdvocates_015-Q09		
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Date Sent:	March 16, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission.

QUESTION 09

In response to remedy PG&E-21-13 on page 216 of PG&E's 2022 WMP, PG&E refers to the Progress Report it filed on November 1, 2021.

Page 39 of this Progress Report states the following with respect development of the system hardening workplan:

In addition, for some CPZs, although the CPZ is not itself the highest risk ranked CPZ, performing system hardening work may allow us to mitigate future PSPS events.

- a) Please state the basis for PG&E's decision to prioritize PSPS mitigation over wildfire mitigation in the situations described above.
- b) Please provide example workpapers to support PG&E's response to part (a), if available.
- c) To the extent that PG&E chooses to perform system hardening "to mitigate future PSPS events," how does PG&E evaluate the PSPS risk of each CPZ and determine how to prioritize CPZs?

ANSWER 09

- a) PSPS mitigation is not absolutely prioritized over wildfire mitigation. General Wildfire Risk is measured in various ways. In our highest risk definition, we include the Wildfire Distribution Risk Model, PSPS, Fire Rebuild, and Public Safety Specialist recommendations. Specifically, for PSPS, PG&E recognizes the use of PSPS as a tool of last resort for wildfire mitigation. Additionally, PG&E recognizes the impact of PSPS to customers is significant. As such, PG&E considers both the wildfire and PSPS impacts for each CPZ in our decisions for system hardening.
- b) N/A
- c) PG&E evaluates the PSPS risk of each CPZ based on the historical lookback of potential PSPS events given current 2021 PSPS protocols. This lookback aggregates 2010 to 2021 potential events into the PSPS consequence model, which calculates the consequence based on the frequency, customer, and duration impacts. This information can be aggregated at various levels of granularity, in this

case to the CPZ level. Prioritization of PSPS impacted CPZs will be based off high consequence CPZs per the potential miles needed to mitigate future PSPS events.