

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

PG&E Data Request No.:	OEIS_004-Q016		
PG&E File Name:	WMP-Discovery2023_DR_OEIS_004-Q016		
Request Date:	May 4, 2023	Requester DR No.:	P-WMP_2023-PG&E-004
Date Sent:	May 9, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Colin Russell Lang

SUBJECT: REGARDING EFFECTIVENESS OF EPSS

QUESTION 016

- a. Provide the formulas and calculations used by PG&E to determine the effectiveness of EPSS.
- b. Provide analysis demonstrating adequate overlap between EPSS risk and wildfire risk to ensure PG&E's mitigations are directly addressing wildfire risk opposed to reliability.
- c. Provide PG&E's workplan for resourcing EPSS-directed mitigation measures, including ratios and work hours shifted around from wildfire risk mitigations. This should also include asset management related mitigations.

ANSWER 016

- a. The 2022 EPSS Ignition Reduction is calculated using the formula below:

$$1 - \frac{2022 \text{ Ignitions}}{\text{avg} (2018 - 2020 \text{ Ignitions})}$$

Where the applicable ignitions are CPUC HFTD Reportable Fire Ignitions in High Fire Threat Districts (HFTD) on primary conductor with EPSS enabled, or for 2018-2020, during the weather-conditions when EPSS would have been enabled (i.e., the ignition reduction calculation is weather-normalized).

- b. We understand "EPSS Risk" to be the aggregated risk of unplanned outages resulting from EPSS enablement. EPSS is a wildfire mitigation that is targeted only in PG&E's high fire-risk areas (HFRA) as well as select HFRA-adjacent areas where, if an ignition were to occur, could propagate into the HFRA. By definition, since the HFRA represents places that have high wildfire risk, this scoping already demonstrates that EPSS as a mitigation is directly addressing places of wildfire risk.

- c. Please reference “WMP-Discovery2023_DR_OEIS_004-Q016Atch01.xlsx.” PG&E has identified the Circuit Protection Zones (CPZs) to be addressed as part of the Vegetation Management and Animal Mitigation EPSS CEMI 8+ proactive mitigation programs. Resources to support EPSS proactive vegetation management work on CEMI 8+ circuit protection zones are being redirected as part of the transition of Enhanced Vegetation Management to more effective wildfire mitigation strategy, as noted in the 2023 WMP. The workplan for Animal Mitigation and identification of the minimal number of required resources to support the plan is currently being finalized.

In addition to vegetation management and animal mitigation on EPSS CEMI 8+ CPZs, EPSS targeted equipment repairs are incorporated into the Open Work Orders Tag program as described in Section 8.1.7 of the WMP. EPSS targeted equipment repairs can be either EC, ER, or CE Notification. Work planning and resourcing for this work is managed according to the Open Work Orders Tag program as noted in Section 8.1.7 and is prioritized based on circuit risk rankings.

Please also reference “WMP-Discovery2023_DR_OEIS_004-Q016Atch02.xlsx” for PG&E’s Fault Indicator Workplan.