

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

PG&E Data Request No.:	CalAdvocates_017-Q01		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_017-Q01		
Request Date:	March 21, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-17
Date Sent:	March 24, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

**QUESTION 01**

Per Table 12 of PG&E's 2022 WMP, the operating expenses for initiative 7.3.6.8 "Protective equipment and device settings" are as follows:

2021: \$18.2 million (actual).

2022: \$142.6 million (projected).

2023: \$140.5 million (projected).

Pages 730-739 of PG&E's 2022 WMP describe how PG&E will increase the mileage covered under this initiative from approximately 11,500 miles in 2021 to approximately 25,500 miles in 2022.

- a) Please explain the projected increase in operating expenses of approximately 7.8 times for a corresponding mileage increase of approximately 2.2 times.
- b) Describe the work that will be funded under the operating expenses for this initiative in 2022.
- c) Describe the work that will be funded under the operating expenses for this initiative in 2023.
- d) Please provide any workpapers you used to develop the forecasts of 2022 and 2023 operating expenses.

**ANSWER 01**

- a. Starting July 2021 PG&E established EPSS as a wildfire mitigation strategy and implemented EPSS on approximately 45 percent of EPSS-enabled circuits in High Fire Risk Areas and High Fire Threat Districts (HFRA/HFTD). In 2022, PG&E will expand the program to enable EPSS in most HFTD and HFRA areas and select circuits in buffer zones immediately adjacent to those areas. Most circuits were returned to normal settings after the October atmospheric river event. As such, 2022 is a full year program vs. approximately three months. Furthermore, additional line miles associated with protecting HFRA/HFTD areas and certain non-Tier buffer areas bring the total line miles potentially in scope for EPSS closer to 45K. Additional drivers of cost increases in 2022 are for:
  - Post-outage patrols on EPSS-enabled circuits before power can be restored to

customers; PG&E is estimating expanding the EPSS program from ~170 circuits in 2021 to 988 circuits in 2022; also 2021 recorded was partial year (August to early November) while 2022 anticipates EPSS season to be from May to December.

- Customer resiliency programs for customers impacted by EPSS; and
  - An expected increase in distribution engineering work volume associated with the increase in devices that required support from approximately 1,000 in 2021 to more than 4,000 in 2022 and funding for testing that was not performed in 2021
- b. In 2022, PG&E will expand the program to enable EPSS mode in most HFTD and HFRA areas and select circuits in buffer zones immediately adjacent to those areas. Work in 2022 will include:
- Distribution control center work to write, check and direct switching related to EPSS outages;
  - Distribution engineering & protection analysis for the development of EPSS settings for each protective device;
  - Field programming and testing of field devices and substation circuit breakers so that they can be EPSS enabled;
  - Post-outage patrols on EPSS-enabled circuits before power can be restored to customers;
  - Deployment of resiliency and support programs to provide better support to key customers and stakeholders to minimize the impact of EPSS outages; and
  - Establish a Project Management Office (PMO) to oversee all planning and operations associated with EPSS.
- c. The work that will be funded under operating expenses in 2023 initiatives are the same as those described for 2022 in part (b)
- d. PG&E developed workpapers in its 2023 General Rate Case to develop its forecast for 2022 and 2023 operating expenses. See Application 21-06-021, Workpapers Supporting PG&E's February 25, 2022 GRC Update, Exhibit (PG&E-4), Chapter 4.