

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023-2025
Data Response

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Date Sent:	April 12, 2024	Requesting Party:	Mussey Grade Road Alliance
PG&E Witness:		Requester:	Joseph Mitchell

p. 57 - Non-Underground Mitigations

QUESTION 011

“This consideration of location-specific benefits and risks is consistent with the prior decision-tree approach we used to select projects and mitigations for completion in 2023 to 2025.” In what ways does the new calculation differ from the previous decision-tree based analysis and in what ways does it differ?

ANSWER 011

PG&E objects to this question on the grounds that it is vague and ambiguous, including that the repetition of the statement “in what ways does [it] differ” may imply that the intent of the question may have not been fully articulated. Nonetheless, PG&E interprets the question as asking for clarity on the difference between the Wildfire Benefit Cost Analysis (WBCA), which we interpret to be the “new calculation” referenced in the question, and the tools used to select system hardening projects prior to the WBCA tool. We have, therefore, answered based on that understanding of the question.

PG&E’s system hardening program starts by using a model to determine where (which circuit segments) we should complete wildfire system hardening work. Once a circuit segment is selected, PG&E’s Grid Design engineers use a decision tree to evaluate the sections of that circuit segment to determine the right mitigation approach along the circuit segment. The primary element that has changed over the last few years is the “model” used to select the majority of circuit segments to then be scoped for hardening, for example:

- Projects selected using PG&E’s Wildfire Distribution Risk Model (WDRM) v2 identified work located in the top 20% circuit segments, selected solely based on wildfire risk scores, and
- Projects selected using WDRM v3 incorporated feasibility factors in combination with wildfire risk scores to create a Wildfire Feasibility Effectiveness (WFE) score.

Going forward, the WBCA is an analytical framework that will compute the total lifetime costs and total lifetime benefits of different mitigations, and combinations of mitigations, at the circuit segment level. As discussed in our 2025 WMP update, the WBCA tool incorporates wildfire risk, as well as reliability, public safety, and cost efficiency in

accordance with the requirements of SB 884. Reliability and public safety are new inputs to the selection process that is used by the WBCA which informs the selection of hardening projects from these additional inputs. The cost efficiency data incorporated into WBCA is more comprehensive than the feasibility score used in WFE. Cost efficiency accounts for benefits associated with wildfire, public safety, and reliability risk reduction, as well as costs associated with vegetation management, lifecycle maintenance costs/operating expenses of various mitigations. Cost efficiency also includes the upfront capital installation costs which were previously incorporated into the WFE score.

Once a project is selected for hardening using the appropriate model as described above, the decision tree was/is used to assess circuit segment factors along the length of the segment to: (a) incorporate the reality that all conditions are not uniform along the length of a circuit segment and different approaches may be necessary within a single circuit segment; and (b) account for additional factors not fully captured by the model used to select projects. These factors include: (1) tree fall-in risk; (2) ingress/egress risk; and (3) PSPS mitigation (see PG&E's 2023-2025 Base WMP R5 at page 430).

In summary, the decision tree approach used by our Grid Engineers to scope hardening projects is very similar from 2023-2025 and into the future. What is changing is our analytical "model" being used to select which circuit segments to harden as the WBCA tool represents a meaningful step forward, incorporating additional inputs (as described above) from the WDRM v2 or WDRM v3/WFE models that were used in the past to select nearly all of the 2023-2025 projects.