

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

PG&E Data Request No.:	SPD_003-Q005		
PG&E File Name:	WMP-Discovery2023_DR_SPD_003-Q005		
Request Date:	April 12, 2023	Requester DR No.:	SPD_PG&E_2023_003
Date Sent:	April 19, 2023	Requesting Party:	Safety Policy Division
DRU Index #:		Requester:	Kevin Miller

SUBJECT: DATA REQUEST SPD_PG&E_2023_003 DUE 4.19.2023

QUESTION 005

Regarding the UG workplan table provided by PG&E, **2023-03-27_PGE_2023_WMP_R0_Appendix D ACI PG&E-22-16_Atch01_CONF.xlsx**:

- a. Why does Column "O" "Risk Rank (V2)" begin at Rank 7 (as opposed to 1) for circuits?
 - i. Why does it end at 3328?
 - ii. Why do the gaps in rank 1-N exist?
- b. Why does Column "R" "Risk Rank (V3)" begin at Rank 6 (as opposed to 1) for circuits?
 - i. Why does it end at 3263?
 - ii. Why do the gaps in rank 1-N exist?

ANSWER 005

- a. There are three primary reasons why the risk ranking does not begin at 1:
 - 1. If the circuit segment length is less than 1 mile then those smaller segments are bundled with other larger projects (e.g., the circuit segments that are risk ranked 1, 3, 4, and 5 were all less than 1 mile and bundled with other larger groups of circuit segments).
 - 2. Some of the circuit segments are privately owned lines; we send an annual letter to the owner reminding them of their responsibility to maintain the line but do not take action on these circuits (e.g., the circuit segment that is risk ranked 2 is privately owned).
 - 3. Some circuits are in the risk model data but work has been completed on that circuit segment and therefore the circuit segment is not included in planned work in the 2023-2026 work plan (e.g., work on a circuit segment that is risk ranked 6 has already been completed).
- i. We have approximately 3,600 CPZs identified in the HFTD as part of the 2021 WDRM V2 . The data provided is only for the circuit segments in the current workplan which represents a subset of the overall 10,000 mile undergrounding program (~2,700 miles) which is only a portion of the overall electric distribution

lines in HFTD. The Risk Rank (V2) ends at 3,328 in the workplan because not all circuit segments are represented in the 2023-2026 workplan, including a number of the circuit segments that are lower on the risk priority list (3,329-~3,600).

- ii. Some of the numerical risk ranks (that would be expected in a complete 1-N dataset) are missing from the workplan data provided primarily because this data only represents the projects in our 2023-2026 workplan which is a subset of the overall 10,000 mile undergrounding program (~2,700 miles), and only a portion of the overall electric distribution lines in HFTD (which total ~25,500 miles). To a lesser extent the exceptions noted in the response to subpart (a) above also apply in that a risk rank number may be skipped if that circuit segment: (1) is small and bundled with the larger project which is represented in the workplan using the mean risk pixel of the larger CPZ, (2) has already had work completed on it, or (3) is privately owned and not included in PG&E's scope of work.

b. There are three primary reasons why the risk ranking does not begin at 1:

1. Using the Wildfire Feasibility Efficiency (WFE) score, PG&E bundles smaller projects (circuit segment is less than 1 mile) with other larger projects (e.g., circuit segment risk ranked 1 is bundled with the large project that is risk ranked 68, segment with risk rank 2 is bundled with segment that is risk ranked 132, and segment with risk rank 4 is bundled with segment risk that is ranked 41).
 2. Some of the circuit segments are privately owned lines; we send an annual letter to the owner reminding them of their responsibility to maintain the line but do not take action on these circuits (e.g., circuit segment that is risk ranked 3 is a privately owned line).
 3. Some circuit segments are not yet included in the 2023-2026 workplan due to the high difficulty of execution (e.g., circuit segment with risk rank 5 is bundled with three other segments with high execution difficulty such that they are not yet scoped in the 2023-2026 workplan).
- i. PG&E has approximately 3,600 total CPZs identified in the HFTD as part of the 2022 WDRM V3. The data provided is only for the circuit segments in the current workplan which represents a subset of the overall 10,000 mile undergrounding program (~2,700 miles) which is only a portion of the overall electric distribution lines in HFTD. The Risk Rank (V3) ends at 3,263 in the workplan because not all circuit segments are represented in the 2023-2026 workplan, including a number of the circuit segments that are lower on the risk priority list (3,264-~3,600).
 - ii. Please see response to subpart a.ii.