

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

PG&E Data Request No.:	SPD_016-Q013		
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_016-Q013		
Request Date:	May 30, 2024	Requester DR No.:	SPD_WSPS_PG&E_2024_006
Date Sent:	June 4, 2024	Requesting Party:	Safety Policy Division
PG&E Witness:		Requester:	Henry Sweat

**SUBJECT: REQUEST FOR CONFIDENTIAL FILES**

**QUESTION 013**

The following questions reference information from the provided in response the previous Data Request CPUC – SPD (Safety Policy Division)\_004.

- a. Provide an updated version of “WMP-Discovery2023\_DR\_SPD\_004-Q001Atch01.xlsx” that includes the data from 2023 and any adjustments since the previous submission made to ignition data in previous years by PG&E.
- b. “WMP-Discovery2023\_DR\_SPD\_004-Q001Atch01.xlsx” indicates 49 CPUC-reportable ignitions occurred during R3, R4, or R5 (R3+) conditions in 2022. The spreadsheet also states in 2022 that there were 3,479,209 Overhead Circuit Mile Days (CMDs) in R3, R4 or R5 conditions. Dividing 49 ignitions by 3,479,209 CMDs \* 100,000 returns an ignition rate of 1.41 ignitions per 100k CMD in R3+ conditions. The ISM submitted a separate graph which indicates the ignition rate was 1.03 which SPD understands was produced by PG&E (see Figure 3 on page 6 of the Q1 2024 ISM report, available at: [PG&E Independent Safety Monitor Report \(ca.gov\)](https://www.pge.com/en/our_work/energy_delivery/special/PGE_independent_safety_monitor_report/PGE_independent_safety_monitor_report.html)). The two ignition rates differ (the rate also appears to differ from other ignition rates computed in the following table) but appear to have similar units and presumably the same methodology and same data.
  - i. Explain the discrepancy, and if there was a different methodology or data source.
  - ii. Discuss the differences and the advantages of one methodology or data source over the other.

**DATA SUPPLIED TO SPD IN CPUC-SPD (SAFETY POLICY DIVISION)\_004**

		FPI					Ignition Rate
		R3	R4	R5	R5+	Total (R3+)	
2022	Ignitions Total	26	21	2	0	49	1.41
	Ignitions in HFTD/HFRA	21	17	2	0	40	1.15
	Ignitions in HFTD/HFRA Distribution	20	15	2		37	1.06
	CMDs	2015280	1351493	112436	0	3479209	

### ANSWER 013

a. Please see “*WMP-Discovery2023-2025\_DR\_SPD\_016-Q013Atch01CONF.xlsx*” which includes the requested data from 2023 and any adjustments since the previous submission made to ignition data in previous years by PG&E.

b.

- i. Per the Independent Safety Monitor’s Status Update Report, published on March 29, 2024, the graph in figure 3 represents the count of R3+ CPUC reportable ignitions in HFTD and/or HFRA normalized by the cumulative R3+ circuit mile days for that same period. There are ignitions included on *WMP-Discovery2023\_DR\_SPD\_004-Q001Atch01.xlsx* that had an FPI rating of R3 or above but are not in HFTD nor HFRA and would have been excluded from the analysis conducted by the ISM.

PG&E’s internal methodology for calculating the results of this metric from 2022 yield 0.95 R3+ ignitions per circuit mile day. This differs slightly from the ISM’s analysis where the cumulative circuit mile day total used as the denominator represented the total number of circuit miles in R3+ conditions calculated at the Fire Index Area (FIA) level; PG&E’s internal methodology uses the cumulative circuit mileage associated with an FPI value calculated for each unique circuit, a more granular approach.

The circuit-specific circuit mileage data was unavailable at the time of the ISM’s analysis.

- ii. PG&E’s internal approach of calculating the ignitions and cumulative circuit miles associated with the FPI calculated for each independent circuit is more granular and a better representation of the risk actualized (in terms of high FPI ignitions in risky places) versus the exposure for that risk in that period. In addition, the circuit level values better align with our operational mitigations (for example: when we would enable EPSS protection).