

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_053-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_053-Q01		
Request Date:	March 10, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-19
Date Sent:	March 15, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

These questions follow up on PG&E's responses to data requests CalAdvocates-PGE-2021WMP-10 Question 6 and CalAdvocates-PGE-2021WMP-15 Questions 1 and 3.

**QUESTION 01**

In the meeting between Cal Advocates and PG&E on March 10, 2021, PG&E described the difference between the mean MAVF risk, and the total MAVF risk. Cal Advocates understands this difference to be the following:

The 2021 Wildfire Distribution Risk Model calculates the risk associated with each 100m x 100m pixel along PG&E's circuit segments. A circuit segment may include only 1 pixel, or may include hundreds. The mean MAVF risk is the average (mean) risk of all pixels along a given circuit segment. The total MAVF risk is the product of the mean MAVF risk and the number of pixels along the circuit segment.

- a) Is the understanding stated above correct? Please provide corrections or clarifications as needed.
- b) When PG&E ranks the risk associated with its circuit segments, is this ranking based on the mean or total MAVF risk? Please explain the reasoning behind your answer.
- c) Does the answer to part (b) differ for vegetation risk and equipment risk? If so, please explain.
- d) In the case of a long segment that traverses both high-risk and low-risk pixels, averaging the risk of pixels to calculate mean MAVF risk could obscure high-risk pixels. What is the basis for PG&E's use of the mean MAVF risk, as opposed to alternate measures such as the maximum or median MAVF risk?

**ANSWER 01**

- a. Yes.
- b. The prioritization of circuit segments used to inform System Hardening and EVM is the mean MAVF value. The mean MAVF score best represents the risk of the circuit segment on a per length basis.

- c. No.
- d. As mentioned in part b, the mean or average MAVF risk score is used to prioritize wildfire mitigations to optimize risk reduction on a per length basis. While prioritizing on the maximum MAVF risk score would also identify circuits with high wildfire risk it would not result in optimizing the risk reduction per mile.