

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

PG&E Data Request No.:	WSD_010-Q13		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_010-Q13		
Request Date:	March 15, 2021	Requester DR No.:	WSD to PGE – Data Request – 20210315
Date Sent:	March 18, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

**QUESTION 13**

In its response to WSD’s Questions on Risk Modeling Presentation (provided on March 5), PG&E states that

“PG&E does not intend to schedule EVM in circuit segments where System Hardening has occurred, is being scoped, or is planned in 2021.”

- a. Does PG&E intend to continue avoiding overlapping efforts past 2021? If not, please explain.
- b. How does PG&E determine if a certain CPZ will undergo system hardening or EVM? What risk factors affect the given options differently?

**ANSWER 13**

- a. Yes, PG&E intends to continue avoiding overlapping efforts past 2021. PG&E’s System Hardening and EVM program leads are working together to avoid overlap between the two programs over the next 3 years, where reasonable, based on where System Hardening work is planned.
- b. Both programs utilize the 2021 Wildfire Distribution Risk Model as described in the PG&E 2021 WMP (Section 4.5.1) to inform the decisions around where to complete each activity. In addition, EVM uses the EVM tree-weighted prioritization list, which is used to determine which EVM circuits are planned for work. System Hardening is a more complete mitigation than EVM because it impacts both vegetation risks as well as asset-related risks. However, it takes a much longer time to complete System Hardening than it does to complete EVM work. Therefore, the decision to be made is not whether to perform System Hardening or EVM work, but when each mitigation is scheduled. PG&E believes that once System Hardening has been completed, EVM will not be as impactful on that segment. In areas where EVM has been completed, PG&E still expects to follow through with System Hardening at a later time. System Hardening miles are prioritized based on the 2021 Wildfire Distribution Risk Model.