

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

PG&E Data Request No.:	WSD_010-Q08		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_010-Q08		
Request Date:	March 15, 2021	Requester DR No.:	WSD to PGE – Data Request – 20210315
Date Sent:	March 17, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

**QUESTION 08**

PG&E's 2021 WMP states:

“The development of the system hardening WMP initiative looked to the ignition probability and wildfire risk values of circuit segments using the 2021 Wildfire Distribution Risk Model for insights which are combined with additional information not included in the model to determine if the proposed mitigation will be effective in reducing risk in that location” (p. 145).

Section 7.3.3.17 provides more detail as to what additional information is considered. Please provide more detail about the process by which mitigation measures are proposed and chosen, including:

- a. Is the additional information considered at the circuit segment level? If not, at what level is the additional information considered?
- b. Does PG&E utilize mitigations equally across a whole circuit segment (i.e. utilize covered conductor on or underground the whole segment)?
- c. Does PG&E install covered conductor along full circuit segments in order to change PSPS thresholds?
- d. How is additional information weighted compared to model outputs in determining if the proposed mitigation will be effective?

**ANSWER 08**

PG&E used the 2021 Wildfire Distribution Risk Model to determine the circuits and circuit segments on which it would be performing system hardening. After determining those circuits and circuit segments, PG&E reviewed additional information to determine what type of system hardening it would perform.

- a. Although system hardening projects are prioritized at the circuit segment level (see 2021 WMP at p. 550), additional information and risks may be evaluated at the project level to determine what kind of system hardening to perform. For example, the tree fall-in risk is a span by span analysis of the vegetation lidar data. The Ingress/Egress risk is a subject matter expert-generated analysis at a project level

in conjunction with those high impact roadways. The PSPS risk is analyzed at a device level.

- b. No, the type of system hardening is selected based on specific factors for each project, including those identified in subpart (a). A system hardening project may be divided into numerous individual projects.
- c. No, PG&E does not yet have applicable thresholds that can be utilized to exclude hardened overhead portions of circuits. PSPS exclusion as part of hardening relies on targeted undergrounding.
- d. As PG&E described in subpart (a), the 2021 Wildfire Distribution Risk Model outputs are not modified by the additional information. However, the additional information is used to determine what type of system hardening would be performed on a specific project.