

August 17, 2020

VIA E-MAIL
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Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Pacific Gas and Electric Company's Reply Comments on Mussey Grade Road Alliance Comments on 2020 Remedial Compliance Plan of PG&E

Dear Director Thomas Jacobs:

Pacific Gas and Electric Company (PG&E) submits the following Reply Comments in response to the Comments submitted by Mussey Grade Road Alliance (MGRA) on August 10, 2020¹ (Comments) on PG&E's 2020 WMP Remedial Compliance Plan (RCP). PG&E provides these Reply Comments within the seven-day requirement.

MGRA was the only party to submit comments on the RCP. The Comments either highlight MGRA's preferences as to components of models and formulas or indicate areas where stakeholders can work together in the future for better understanding or alignment. The Comments do not assert that there are any deficiencies with PG&E's RCP and therefore should not support a denial of the sufficiency of the RCP to meet the Class A Conditions. The following are PG&E's responses to these Comments and recommendations of MGRA and we appreciate this opportunity to provide clarification in areas related to our RCP.

MGRA Comment 1.2.2: Additional Detail in PG&E's Response

- MGRA requests the Wildfire Safety Division (WSD) ask PG&E for additional information on Table 1, specifically wind speed information regarding distribution circuit risks.²

¹ Mussey Grade Road Alliance Comments on 2020 Remedial Compliance Plans of SDG&E, PG&E and SCE, August 10, 2020.

² Comments, p. 3.

- MGRA requests that WSD ask PG&E for the algorithm used in its Distribution Vegetation model.³

PG&E’s Reply Comment

PG&E does use wind factors in our risk modeling for our distribution circuit risks. Wind speed information is included in our Outage Producing Winds (OPW) model, which PG&E uses to assess the probability of failure of distribution assets associated with wind. Additionally, in our existing system hardening models, outage history is incorporated into our risk prioritization which indirectly includes historical wind, as wind contributes to outages in the form of vegetation and equipment failures. Finally, the system hardening model currently under development to inform 2021 system hardening work will incorporate peak wind speed as an input into the Multi-Variable Regression model that will prioritize work locations. Therefore, WSD does not need to request additional wind information be included in Table 1.

Regarding the request for the Distribution Vegetation Model algorithm, we are happy to provide it to parties who sign an appropriate NDA as the algorithm is business proprietary confidential. Additionally, upon further review, we determined that the RCP is unclear where it states that our Vegetation Risk Model is at the “100-square-meter-level.”⁴ Instead, it should say that the model is at the “100m x 100m pixel level” at these locations within our RCP.

MGRA Comment 1.2.3: Errors in PG&E’s OPW Model

- MGRA requests WSD conduct an urgent technical review of the OPW model.⁵

PG&E’s Reply Comment

MGRA provides insight as to how it believes the OPW model should be formulated and PG&E appreciates the thoughtful analysis. Once the 2020 fire season is over, PG&E would be happy to engage with MGRA, and other stakeholders, on its analysis with our meteorology and fire science teams; however, at this time, these subject matter experts are providing critical functional and operational efforts toward risk mitigations for this wildfire season. PG&E’s condensed description of the OPW model in this submission may not have been sufficient for MGRA, or other parties, to fully replicate the model and how it contributes to PSPS decision-

³ *Id.*

⁴ RCP, pp. 9 and 52. The “100-square-meter-level” statement could be interpreted as meaning that the model calculates at the 10m x 10m (100 square meter) level, which is inaccurate and not what PG&E intended, the model in question calculates at the 100m x 100m pixel level.

⁵ Comments, p. 6.

making. Such an in-depth sharing of the OPW model was not required in the RCP submission and we believe that an urgent technical review is unfounded at this critical time and would be distracting to those subject matter experts who require focus and diligence at during this peak of wildfire season.

MGRA Comment 2: Vegetation Management

- MGRA requests the IOUs collect “fall-in”/ “blow-in” data.⁶

PG&E Reply Comment

PG&E appreciates MGRA’s interest in this type of data. However, it is not clear that this request is related to the RCP. PG&E tracks data on all vegetation caused outages, including whether they were caused by “fall-in” and “blow-in.” Because this type of data was not requested as part of the Conditions, PG&E did not provide as part of our RCP. PG&E can provide this data if requested in an appropriate forum, however such a request for additional information outside of the WMP Template requirements and the Condition requirements does not reflect a deficiency in PG&E’s WMP.

MGRA Comment 3: PG&E’s Lack of Granular Detail – Condition PGE-1

- MGRA recommends WSD request quantitative estimates of effectiveness of initiative at reducing ignition risk or provide a reason why it cannot be provided.⁷
- MGRA recommends PG&E break its covered conductor and hardening programs into separate initiatives.⁸

PG&E Reply Comment

As part of PG&E’s RCP, we indicated that we would be quantifying risk reduction effectiveness in the form of risk spend efficiencies (RSE), and that we will provide RSEs for a substantially increased number of initiatives as part of our first quarterly report submission on September 9, 2020.⁹ Additionally, the Condition already requires that for those that the utility cannot provide this information for an initiative, it needs to indicate why.¹⁰ We anticipate that MGRA’s concern will be largely addressed in our first quarterly report submission.

⁶ *Id.*, p. 7.

⁷ *Id.*

⁸ *Id.*

⁹ RCP, pp. 14 and 18.

¹⁰ RCP, pp. 16-19.

Additionally, in PG&E's July 13, 2020 letter, as requested by WSD, PG&E listed those initiatives that are combined into programs and not tracked separately. The majority of the work in PG&E's system hardening program results in the installation of covered conductor. As part of our September 9, 2020 submission, we are working to provide an estimate of undergrounding activities separate from covered conductor within the system hardening program. Our system hardening program does not naturally allow for separation of these programs based on the operations of the business, and as such the split between these sub-initiatives will be based on assumptions as discussed in our July 13, 2020 letter and as will be further explained in our September 9, 2020 submission.¹¹

MGRA Comment 4: PG&E's High Incidence of Conductor Failure – Condition PGE-3

- MGRA recommends WSD request require PG&E to give priority to high winds in the HFTD to target its conductor replacement program.¹²
- MGRA suggests PG&E present unfiltered wire down data that includes Major Event Days.¹³

PG&E Reply Comment

PG&E's system hardening / conductor replacement efforts incorporate wind data, as explained above. *See* PG&E's Reply to MGRA Comment 1.2.2.

Regarding providing unfiltered wire down data that includes Major Event Days, this information was not requested for the RCP. However, PG&E is open to discussing with MGRA the additional data if it is needed and can provide this data if requested in an appropriate forum.

In summary, PG&E appreciates the Comments and looks forward to working with MGRA, and all stakeholders, in the future on further mitigating utility caused wildfire risks. However, for the reasons explained above, PG&E's RCP complied with the direction in Resolutions WSD-002 and WSD-003 and thus should be approved by WSD.

¹¹ July 13, 2020 letter to WSD

¹² *Id.*, p. 8.

¹³ *Id.*, p. 9.

Sincerely,

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Cc: R.18-10-007 service list