

PACIFIC GAS AND ELECTRIC COMPANY RSE LITE TOOL DOCUMENTATION AND USER GUIDE

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2 1 INTRODUCTION AND PURPOSE

3 The RSE Lite tool was created to estimate the Risk Spend Efficiency (RSE) of a proposed program given 4 the program characteristics such as scope, cost, effectiveness, benefit length, etc. This tool uses existing 5 baseline data (Tranche Exposure, Likelihood and Consequence of a Risk Event) for a specified risk event 6 or a Cross Cutting Factor, computed from the Enterprise Risk Model (ERM) and focuses on calculating a risk reduction and RSE on a program by program basis. In this document, the terms Baseline and Test 7 8 Year (TY) Baseline are used interchangeably. For the 2023 GRC, program risk reduction is calculated 9 relative to the TY Baseline. In other use cases, it may be appropriate to use the Baseline instead. For 10 more details on baseline risk scores and RSE calculation methodology, please read the ERM 11 Documentation and User Guide¹.

This RSE Lite Tool Documentation and User Guide assumes that a reader is familiar with the terminology and methodology explained in the ERM Documentation and User Guide and explains the information specific to the RSE Lite tool, which implements a simplified risk reduction and RSE calculation so that the effects of adjusting program characteristics can be quickly estimated.

17 2 RSE LITE METHODOLOGY

18 The RSE Lite tool requires as an input the yearly Likelihood of Risk Event (LoRE), Consequence of Risk

19 Event (CoRE), and Tranche Exposure. This LoRE and CoRE represent the baseline risk, which is the risk

- 20 score assuming that the control programs are in place (controls are programs that are in place that
- reduce the risk from an Inherent case to the Baseline case). This has implications when calculating risk
- reductions for controls and mitigations. Consistent with the 2018 S-MAP Revised Lexicon², mitigations

are programs that further reduce risk from the baseline risk score in the presence of the program, while

controls are programs that would increase risk from the baseline risk score in the absence of theprogram.

- 26 This section is structured so that the reader can follow the flow of information in the RSE calculation
- 27 procedure from Program Inputs (Section 2.1) to the RSE calculation (Section 2.5). However, the reader

28 may also find it useful to follow the narrative in the Outputs (Section 3.4), which starts from the RSE

- 29 calculation (Section 2.5), the highest, most aggregated level and follow how this uses the most granular
- 30 level of information provided in Program Inputs (Section 2.1).

31 2.1 PROGRAM INPUTS

- 32 To estimate the risk reduction of a program, the following user input is required. User inputs are
- described in more detail in Section 3.2.

¹ See "Risk Modeling WP-1 PGE Enterprise Risk Model Documentation and User Guide"

² See <u>D.18-12-014</u>, p.16

1	1.	Program scope describing how much of the tranche exposure is affected by the program in each	Program
2		year.	year.
3			
4	2.	Program Cost and how the cost is allocated to specific Tranches within the Risk Event to get	Program
5		Program Cost by Tranche.	Program
6			
7	3.	The risk reduction impact of the program, characterized by	The risk
8		a. Effectiveness as a percentage reduction of specific driver/sub-driver frequencies and/or	a.
9		percentage reduction of the consequence of specific attributes for the program scope	
10		specified.	
11			
12		For mitigations the effectiveness is expressed as a reduction relative to the baseline.	
13			
14		For controls the effectiveness can be expressed in two ways: 1) work unit based: as an	
15		expected number of risk events reduced per work unit 2) exposure unit based: as a	
16		reduction relative to the inherent risk, i.e. the risk without the control program being	
17		evaluated.	
18			
19		b. Benefit length, i.e. the number of years that the risk reduction of the program persists,	b.
20		once the program is implemented.	
21			
22		c. Effectiveness degradation rate or method, describing how the effectiveness degrades	
23		over the benefit length.	

24 2.2 TRANCHE-LEVEL AVERAGE EFFECTIVENESS

The program effectiveness input is with respect to the program scope applied, and the program scope can often be a subset of the tranche exposure. Thus, the effectiveness input needs to be adjusted (or normalized) to be the effectiveness that can be applied to the tranche-level risk score. We term this tranche-level average effectiveness. For example, if the program scope is 30% of the tranche exposure and effectiveness input is 40% to the program scope, then the tranche-level effectiveness is 30%*40% = 12% on average for the tranche.

31 The program effectiveness input is also for the first year of the program implemented. If the program is

32 implemented or performed on a specific program scope in year *yO* and program benefit lasts *n* years,

33 then the program effectiveness needs to be extrapolated using the specified effectiveness degradation

34 rate or method for the years *y*0+1, ..., *y*0+*n*-1.

35 Specifically, given the program inputs (i.e., scope, effectiveness, benefit length, effectiveness

degradation rate), the RSE Lite tool computes average effectiveness of the program as a percentage of

37 tranche risk score for an applicable sub-driver or attribute that the program mitigates.³

38 $AvgEff(y, Tranche, \cdot)$ is the tranche-level effectiveness accounting for the program scope, benefit life,

39 and degradation as applicable:

³ When the program effectiveness is different by outcomes, this calculation is done at the tranche-outcome level.

1 (1)
$$AvgEff_{y0}(y, Tranche, \cdot) = \frac{ProgramExposure_{y0}(y)}{Exposure(y)} Eff(Tranche, \cdot) DegradationFactor(y - y0)$$

2 Where

3 (2)
$$DegradationFactor(k) = \begin{cases} 0, & if k \ge BenefitLife \\ DF_{m,k}, & if k < BenefitLife and DegradationMethod = m \end{cases}$$

4 Where *DegradationFactor* is Effectiveness Degradation Rate, and Degradation Method is the 5 Effectiveness Degradation Method as input by the user and described in Section 3.2.4.

6 For Mitigation programs, the $AvgEff_{v0}(y, Tranche, \cdot)$ is used directly to compute risk reduction

7 without further conversion. For Control programs whose exposure unit is not expressed as 'Work unit',

8 the effectiveness input is in terms of effectiveness from Inherent Risk (i.e, risk with the control program

9 removed from baseline), thus $AvgEff_{y0}(y, Tranche, \cdot)$ is converted to the Effectiveness relative to the

10 Baseline Risk using the following formula before being multiplied to Baseline Risk in Section 2.3:

11 (3)
$$AvgEff_{y0}(y, Tranche, \cdot) \leftarrow \frac{AvgEff_{y0}(y, Tranche, \cdot)}{1 - AvgEff_{y0}(y, Tranche, \cdot)}$$

12

13 2.3 TRANCHE-LEVEL RISK REDUCTION

Once the tranche-level average effectiveness is obtained, the tranche-level risk reduction in each year for an applicable sub-driver or attribute can be calculated as a product of 1) the average effectiveness value of the program to the tranche risk score and 2) tranche risk score. These risk reduction values are then aggregated. Specifically, the risk reduction for year y for a preventive program⁴ implemented in year y0 is calculated as: (4) Frequency Risk Reduction_{y0}(y, Tranche) = Exposure(y, Tranche) ×

20 $\sum_{outcome}[(\sum_{subdriver} LoRE Reduction (y, Tranche, Outcome, subdriver)) \times$

22 Where

- 23 (5) LoRE Reduction(y,Tranche,Outcome,subdriver) =
- 24 $AvgEff_{y0}(y, Tranche, Outcome, subdriver) \times LoRE(y, Tranche, Outcome, subdriver)$
- 25 The risk reduction for year y for a protective program⁵ implemented in year *y0* is calculated as:

26 (6) Consequence Risk Reduction_{$$v_0(y, Tranche) = Exposure(y, Tranche) ×$$}

- 27 $\sum_{Outcome} [LoRE(y, Tranche, Outcome) \times$
- 28 $\sum_{Attribute} CoRE Reduction(y, Tranche, Outcome, Attribute)]$
- 29 Where

⁴ A preventive program is a program that reduces the likelihood of a risk event

⁵ A protective program is a program that reduces the consequence of a risk event.

1 (7) CoRE Reduction(y,Tranche,Outcome,Attribute) =

2 $(AvgEff_{y0}(y, Tranche, Outcome, Attribute) \times CoRE(y, Tranche, Outcome, Attribute)$

3 Note that the direct multiplication of the program effectiveness to the CoRE value is a simplification of

4 the ERM model methodology. The ERM methodology applies the program effectiveness to the

5 simulated natural unit of the consequence, applies the MAVF scaling function to calculate the simulated

6 CoRE values, and finally averages the CoRE values to compute the Risk Score.

7 Tranche-level Risk Reduction from a mitigation program for each year is then calculated as in equation8 (8). For a control program, the last term in equation (8) is added instead of subtracted.

- 9 (8) Risk Reduction_{y0}(y, Tranche) = Frequency Risk Reduction_{y0}(y, Tranche) +
- 10 Consequence Risk Reduction_{y0}(y, Tranche)

12
$$\times \sum_{outcome} \left[\sum_{subdriver} \left(AvgEf f_{y0}(y, Tranche, Outcome, subdriver) \right) \right]$$

13 × LoRE(y, Tranche, Outcome, subdriver)

14 ×
$$\sum_{Attribute} (AvgEff_{y0}(y, Tranche, Outcome, Attribute))$$

15
$$\times CoRE(y, Tranche, Outcome)) > \frac{Exposure(y, Tranche)}{ProgramExposure_{y0}(y, Tranche)}$$

16 Note that most programs either reduce likelihood or consequence of a risk event, not both. When that

17 is true, programs have zero as the last term above, and one of the first two terms will also be zero.

18 2.4 NPV OF RISK REDUCTION

19 The Net Present Value (NPV) of Tranche Risk Reduction for a program implemented in *yO* is calculated 20 as:

21 (9) NPV Risk Reduction_{y0}(Tranche)

$$= \sum_{y_0 \le y < y_0 + Benefit \ ife} \left(\frac{1}{(1+r)^{y-y_0}} \times Risk \ Reduction_{y_0}(y, Tranche) \right)$$

23 where *r* is a discount rate consistent across all risks and the Benefit Life is as specified per program.

24 NPV Risk Reduction from a program is then aggregated over applicable tranches:

25 (10)NPV Risk Reduction_{y0} = $\sum_{Tranche} NPV$ Risk Reduction_{y0}(Tranche)

26 2.5 RSE

22

27 The Risk Spend Efficiency (RSE) of program implemented in year yO is calculated as the ratio of the net

28 present value of annual risk reduction to the net present value of the costs, as follows:

29 (11) $RSE_{y0} = \frac{NPV Risk Reduction_{y0}}{NPV (Cost_{y0})}$

2 The RSE of program implemented over the GRC period (i.e., 2023-2026) is also calculated in the RSE lite 3 tool as:

4 (12)
$$RSE_{2023-2026} = \frac{\sum_{y_0=2023}^{2026} NPV Risk Reduction_{y_0}}{\sum_{y_0=2023}^{2026} NPV (Cost_{y_0})}$$

5

6 2.6 CAVEATS AND LIMITATIONS

As mentioned the Risk Reduction Methodology section 2.3 of this Document and Portfolio-level Analysis
Section 4.2.1 in the ERM Documentation and User Guide, the RSE Lite Tool will not produce the same
RSEs as the Enterprise Risk model because the RSE Lite Tool:

Simplifies consequence mitigation calculation by computing CoRE reduction, not Natural Unit
 reduction.

Does not consider diminished risk reduction when a program interacts with other programs
 (different program mitigates risk on the same exposure). Thus, the risk reduction and RSE values
 here are for comparing programs against one another and should not be used to calculate the
 risk reduction of a portfolio of programs⁶.

- Does not consider diminished risk reduction when a program **overlaps** itself in time (same program mitigates risk on the same exposure)⁷
- 18

19 **3 RSE LITE USER GUIDE**

20 This section of the document describes how the methodology described in Section 2 has been

21 implemented, and serves as a User Guide as to how the information flows between PG&E's Enterprise

22 Risk Model (ERM) and the RSE Lite Tool to calculate marginal risk reduction and Risk Spend Efficiency

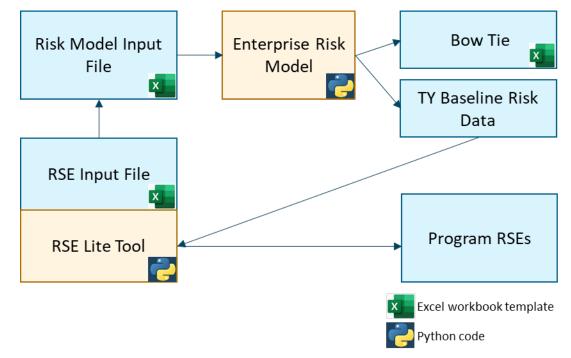
23 Values.

⁶ For more information on scope overlap between programs, see Section 4.2.1. of the "Risk Modeling WP-1 PGE Enterprise Risk Model Documentation and User Guide"

⁷ For more information on the scope overlap within a program, see the same reference as in footnote 6.

1 3.1 TOOL ARCHITECTURE

- 2 The RSE Input File and RSE Lite Tool are both components of PG&E's risk quantification process, as
- 3 shown in Figure 1 below, replicated from the ERM Documentation and User Guide.



4 5

Figure 1: Enterprise Risk Model Architecture

- 6 The RSE Input File contains the input formation needed to run the RSE Lite Tool. Each RSE Input File
- 7 contains the Controls and Mitigations that serve to maintain or reduce risk levels for a particular Risk
- 8 Event or Cross Cutting Factor. Program definition includes program scope, cost, effectiveness, and
- 9 benefit length that affect relevant bow-tie elements.
- 10 The RSE Lite Tool also relies on ERM model output (aka TY Baseline Risk Data⁸) for Tranche exposure,
- 11 Test Year Baseline LoRE, and Test Year Baseline CoRE values to calculate the program risk reduction.
- 12 In general, the RSE Input file follows a similar convention for cell formatting as the Risk Model Input File:

Description

Input cell - user input required Error checking cell - formula that should not be touched Analysis cell - formula that should not be touched



13 3.2 INPUTS

- 14 The first five tabs in the RSE Input File are where the user provides inputs that characterize the
- 15 Mitigation and Control programs. The tabs numbered 1- through 4- are parsed by the RSE Lite Tool
- 16 Python code to perform the risk reduction and RSE calculation as described in Section 2. In addition,

⁸ TY Baseline Risk Data files are available for each Risk Event for which RSEs are calculated.

- 1 there may be as many additional informational tabs as needed to support the information in these five
- 2 tabs.
- 3 The following subsections detail inputs provided by the user in each of the named tabs.
- 4 3.2.1 Tab Summary of Programs
- 5 This tab provides the user and reviewer a high-level view of the programs that affect a Risk Event or
- 6 Cross-Cutting Factor.
- 7 Each row in the table contains a high-level summary of the Control and Mitigation programs. The first
- 8 three columns (Program ID, Program, and Mitigation or Control) is used to identify the programs in later
- 9 tabs, so it is important that the program names in this tab must match identically the program names in
- 10 the other tabs.

11 3.2.2 Tab 1-Program Exposure

- 12 The table *TableExposure* in this tab allows the user to specify the program scope.
- <u>Program ID:</u> Unique identifier for the Program; this is a lookup via formula from the Summary of
 Programs tab.
- <u>Type:</u> Whether the program is a Mitigation or Control; this is a lookup via formula from the
 Summary of Programs tab.⁹
- 17 <u>Program</u>: Input the program name exactly as written in the Summary of Programs tab.
- 18 <u>Risk (for Cross Cutter Only):</u> For Cross Cutting programs, the programs need to be mapped to a
 19 particular Risk Event. Each program mapped to a particular Risk Event needs to have its own
 20 row.

21 <u>Tranche:</u> the tranche that the program affects

22 If the program affects all tranches, leave as blank

23 If the program affects a few tranches, either

- 1. list each tranche in a separate line with the same program name, or
- 2. use the keyword "- All" to specify aggregate tranches. More detail on how to specify aggregate tranches in Section 3.2.2.1
- 28 <u>Program Exposure YYYY:</u> Specify the program exposure for year YYYY in the units as specified in
 29 the <u>Unit for Program Exposure</u> column.
- 30 <u>Unit for Program Exposure:</u> The dropdown provides three options:
- 31 1. Exposure unit
- 32 2. % of tranche exposure
- 33 3. Work unit

24 25

26

27

Choose "Exposure unit" to indicate that the program exposure entries are in the same units as the tranche exposure, "% of tranche exposure" if the program exposure entries are expressed as percentage of the tranche exposure, and "Work unit" if the program is a control and the

⁹ A control program is occasionally termed 'Compliance Control'. This is handled identically in calculations to a 'Control' program.

- program exposure entries indicate the number of assets to be worked on. Note: If "Work unit" is
 selected, the effectiveness values specified in Tab 3 or 4 are interpreted differently and a slightly
 modified methodology is used to calculate the risk reduction from the program. This
 methodology is described in Section 3.2.2.2.
- 5 <u>Risk Exposure Unit:</u> An optional text field for the user to specify the risk exposure unit as
 6 modeled in the ERM. *For informational purposes only.*

Work Units YYYY: For some programs, work units are specified in the GRC filing, and these may
 differ from the risk exposure units used in the ERM. An example of this is for the Vegetation
 Management program for the Failure of Electric Distribution Overhead Assets risk (DOVHD). The
 risk exposure units are in miles while the work units are by the number of trees being managed
 by the program. For informational purposes only.

- For some Control programs, the user may choose to use work units as the <u>Unit for Program</u> <u>Exposure</u>. In this case, the <u>Program Exposure YYYY</u> columns will have the same values as the <u>Work Units YYYY</u> and a different methodology is used to calculate the risk reduction from the program. This methodology is described in Section 3.2.2.2.
- 16 <u>Unit for work units:</u> An optional text field for the user to specify the work unit. *For informational* 17 *purposes only.*
- 18 <u>Explanation of relationship between different units:</u> An optional text field for the user to
 19 describe the relationship between the different units if the connection is not obvious. *For* 20 *reference only.*
- 21 <u>Other Note:</u> An optional text field for the user to provide any other information. *For* 22 *informational purposes only.*
- 23 <u>Flag for modeler:</u> A validation cell that throws a flag if the Unit for Program Exposure is specified
 24 as "% of tranche exposure", but the value in the Program Exposure YYYY cells are greater than 1.
- 25 <u>Risk ID:</u> Used by the model to filter and sort Cross-Cutting Factor programs by Risk Event.
- 26 References the <u>Risk (for Cross Cutter Only)</u> column. If this column is empty, the value defaults to 27 the Risk Event Risk ID.

28 *3.2.2.1 Specifying aggregate Tranches*

- 29 To group tranches, "- All" text will serve as a wildcard to use all the tranches that begin with the text
- before the "-" character. Note that a space is preferred around the "-" character for readability, but not
 necessary.
- 32
- The <u>Unit for Program Exposure</u> for aggregated tranches can be in any of the options provided to the user. If "% of tranche exposure" is selected, the same percentage is used across all the tranches within the aggregated tranche. Otherwise, the value provided is allocated to each of the tranches within the
- 36 aggregated tranche proportional to the tranche exposure.
- 37
- 38 Illustrative examples using simplified wildfire tranches as listed below.

Tranche	Exposure (miles)
HFTD - Distribution - A	50

HFTD - Distribution - B	75
HFTD - Distribution - C	100
Non-HFTD - Distribution	5000
HFTD – Transmission – Tier 1 – Voltage Class 1	20
HFTD – Transmission – Tier 1 – Voltage Class 2	40
HFTD - Transmission - Tier 2 - Voltage Class1	45
HFTD - Transmission - Tier 2 - Voltage Class2	50
Non-HFTD - Transmission - Voltage Class1	2000
Non-HFTD - Transmission - Voltage Class2	4000

2 Given the list of tranches above, different levels of aggregated tranches can be specified:

- 3 <u>HFTD All</u>: applies the program to all HFTD tranches.
- 4 <u>HFTD Distribution All</u>: applies the program to tranches that start with "HFTD Distribution"
- 5 <u>HFTD Transmission All</u>: apples the program to tranches that start with "HFTD Transmission"
- 6 HFTD Transmission Tier 2 All: applies the program to tranches that start with "HFTD -
- 7 Distribution Tier 2"

8 Example 1: Specifying aggregate Tranche Exposure as "% of tranche exposure"

9 In the 1-Program Exposure tab:

Program		Program	Unit for Program
	Tranche	Exposure 2020	Exposure
Program A	HFTD – Distribution – All	15%	% of tranche exposure

10

11 In the RSE Lite Tool, the Program Exposure is expanded to

Program	Tranche	Program Exposure (miles)
Program A	HFTD - Distribution – A	15% * 50 = 7.5
Program A	HFTD - Distribution – B	15% * 75 = 11.25
Program A	HFTD - Distribution – C	15% * 100 = 15

12

13 Example 2: Specifying aggregate Tranche Exposure as "Exposure unit"

14 In the 1-Program Exposure tab:

Program		Program	Unit for Program
	Tranche	Exposure 2020	Exposure
Program A	HFTD – Distribution – All	50	Exposure unit

15

16 In the RSE Lite Tool, the Program Exposure is expanded to

Program	Tranche	Program Exposure (miles)
Program A	HFTD - Distribution - A	50 * 50/225 = 11.1
Program A	HFTD - Distribution - B	50 * 75/225 = 16.7
Program A	HFTD - Distribution - C	50 * 100/225 = 22.2

17 The Tool will allocate the total Program Exposure by the relative percentage of the tranche exposure.

18 The same methodology applies if the <u>Unit for Program Exposure</u> selected is "work unit".

1 3.2.2.2 Methodology for program exposure specified as Work Units

As mentioned in the methodology in Section 2.1, the RSE Lite tool allows the user to specify the Program
 Exposure for Control programs in Work Units and interpret effectiveness input as an expected number

4 of risk events reduced per work unit. In order words, it is the probability of having a risk event when one

- 5 unit of work is not performed, multiplied by the probability of preventing the risk event when one unit
- 6 of work is performed. Then, instead of calculating the LoRE reduction per Unit Tranche Exposure
- 7 directly, the subdriver-level Frequency reduction is first calculated as:
- 8 (13) Frequency Reduction (y, Subdriver, Tranche, Outcome) = 10 11 $WorkUnits(Tranche) \times Effectivenes(y, Subdriver)$ 12 9 $\times \frac{BaselineFrequency(y, Subdriver, Tranche, Outcome)}{\sum_{applicable Subdrivers} \sum_{Outcome} BaselineFrequency(y, Subdriver, Tranche, Outcome)}$
- 13 This frequency reduction is then converted to the LoRE reduction per Unit Tranche Exposure using the 14 following equation:
- 15 (14)Lore Reduction(y, Tranche, Outcome) =

16
$$\sum_{Subdriver} \frac{Frequency Reduction (Subdriver, Tranche, Outcome, Year)}{Exposure(Tranche)}$$

- 17 Beyond this point, the same calculation as in Section 2.3 follows.
- 18 3.2.3 Tab 2-Program Cost
- 19 There are two tables in this tab. The first table, *TableProgSpend*, allows the user to specify the costs by
- 20 program.

21 <u>Program ID:</u> Unique identifier for the Program; this is a lookup via formula from the Summary of 22 Programs tab.

- <u>Type:</u> Whether the program is a Mitigation or Control; this is a lookup via formula from the
 Summary of Programs tab.
- 25 <u>Program</u>: Input the program name exactly as written in the Summary of Programs tab.
- 26 <u>MAT (optional)</u>: This allows the user to further disaggregate the program costs into
- 27 Maintenance Activity Type (MAT) level, if preferred. The user can use this column as
- 28 informational to indicate what MAT codes are related to this program. Alternately, the user can
- 29 use different rows to specify costs related to different MAT codes for the same program.
- Independent of how the MAT column is used, the RSE Lite Tool will calculate the Risk Spend
 Efficiency based on the total program cost.
- 32 <u>CapEx USD YYYY:</u> The annual capital expenditures for the program, a user input. To account for
- all costs associated with capital investments subject to cost-of-service ratemaking (i.e.,
- depreciation, income taxes, property tax, insurance, incremental expenses and return on equity
 over the life of an asset), a Present Value of Revenue Requirement (PVRR) multiplier is applied in
- over the life of an asset), a Present Value of Revenue Requirement (PVRR) multiplier is applied in
 the RSE Lite Tool based on user selections in later columns. The PVRR multiplier methodology is

1 2	described in Section 3.2.3.1 of this Document as well as Section 1.6.2 of the ERM documentation and User Guide.
3	<u>OpEx USD YYYY:</u> The annual expense expenditures for the program, a user input.
4	Asset Type: The asset type for the capital expenditures.
5 6 7	<u>Generic Capital PVRR Multiplier:</u> The PVRR multiplier based on default assumptions based on the <u>Asset Type</u> selection, not including incremental operation and maintenance (O&M) costs, as described in in Section 3.2.3.1. If <u>Asset Type</u> is "Custom", this cell will be blank.
8 9 10	<u>Custom Capital PVRR Multiplier:</u> A user-defined PVRR multiplier, not including incremental O&M costs. Assumptions made to arrive at this multiplier should be justified in a separate reference tab. The <u>Asset Type</u> should be specified as "Custom" for this value to be used.
11 12 13	<u>Generic Lifetime Incremental O&M PVRR Multiplier:</u> The incremental O&M cost associated with the capital expenditure based on default assumptions and the <u>Asset Type</u> selection as described in in Section 3.2.3.1.
14 15 16 17	<u>Custom Lifetime Incremental O&M PVRR Multiplier (optional; specify if 0):</u> A user-defined Lifetime Incremental O&M PVRR Multiplier. Assumptions made to arrive at this multiplier should be justified in a separate reference tab if applicable. Some capital expenditures do not result in incremental O&M.
18 19 20	<u>Lifetime Incremental O&M PVRR Multiplier:</u> If a <u>Custom Lifetime Incremental O&M PVRR</u> <u>Multiplier</u> is specified, that value is used, otherwise use the <u>Generic Lifetime Incremental O&M</u> <u>PVRR Multiplier.</u>
21 22 23 24 25 26	<u>PVRR multiplier</u> : The present value of revenue requirement multiplier to the net present value (NPV) of capital expenditure, representing the revenue requirement of a capital investment (O&M, depreciation, return on equity, etc.) over the lifetime of the asset. The PVRR multiplier is the sum of the Capital PVRR Multiplier and the <u>Lifetime Incremental O&M PVRR Multiplier</u> . If <u>Asset Type</u> is "Custom", then the Capital PVRR Multiplier equals the <u>Custom Capital PVRR</u> <u>Multiplier</u> , otherwise the Capital PVRR Multiplier equals the <u>Generic Capital PVRR Multiplier</u> .
27 28	<u>Notes</u> : An optional text field for the user to provide any other information. <i>For informational purposes only.</i>
29 30 31	The second table, <i>TableTranchSpend</i> , allows the user to specify the allocation of the total program costs to program cost by tranche. Note that for Cross Cutting Factor programs, the costs are not allocated by Risk and therefore this table is intentionally left blank.
32 33	<u>Program ID:</u> Unique identifier for the Program; this is a lookup via formula from the Summary of Programs tab.
34 35	<u>Type:</u> Whether the program is a Mitigation or Control; this is a lookup via formula from the Summary of Programs tab.
36	<u>Program</u> : Input the program name exactly as written in the Summary of Programs tab.

- 1MAT (optional):If MAT is specified in TableProgSpend, then the costs can be allocated by MAT2and by tranche.
- 3 <u>Allocation method:</u> There are two cost allocation methods supported by the RSE Lite Tool:
- 4 1. Prorate by Program Exposure, which prorates the costs to applicable tranches affected by the 5 program based on the program scope.
- 6 2. % of Total cost, where the user will specify the percentages to be allocated to the applicable
 7 program tranches in the columns to the right.
- 8 For more detail on the allocation methodologies, see Section 3.2.3.2.
- 9Tranche: Specify only if Allocation method is "% of Total cost". There should be a row for each10applicable tranche for a program, with as many tranches as specified in Tab 1-Program
- 11 Exposure.
- 12 <u>Spend USD YYYY:</u> The annual percentage of the total cost allocated to the tranche specified in 13 the row. Note that this percentage will apply to both capital and expense expenditures.

14 *3.2.3.1 Treatment of Capital Costs*

- 15 As mentioned in the ERM documentation, the Present Value of Revenue Requirement (PVRR) multiplier
- 16 accounts for the revenue requirements associated with capital investments. These include insurance,
- 17 depreciation, income taxes, property tax, return on equity, and any incremental (or decremental)
- 18 operation and maintenance (O&M) costs. In the calculation of RSEs for the 2023 GRC, PG&E has made a
- first effort to incorporate the Revenue Requirement associated with the capital investment through a
 simple PVRR multiplier, obtained mostly using generic assumptions. PG&E expects that this can be
- 20 simple PVRK multiplier, obtained mostly using generic assum21 further refined and improved over time.
 - 22
 - The PVRR multiplier is the sum of two components: the Capital PVRR Multiplier, and the O&M PVRRMultiplier.
 - 25

26 The Generic Capital PVRR Multiplier is calculated using standard assumptions¹⁰ of federal, state and

- 27 property tax rates, rate of return, and asset book depreciation life values for several asset groups. Some
- examples of asset groups include buildings, computer software, gas meters, electric distribution assets,
 gas distribution, and gas transmission & storage.
- 30 If desired, a <u>Custom Capital PVRR Multiplier</u> may be calculated by the user for the specific program if 31 different assumptions other than the standard assumptions are warranted
- different assumptions other than the standard assumptions are warranted.
- The <u>Generic Lifetime O&M PVRR Multiplier</u> is derived from 2016 to 2020 recorded expenses as a percentage of gross book value for each asset group. The average annual O&M for each asset group was
- estimated based on the average over the 2016 to 2020 recorded O&M costs for LOB asset group:
- 35 (15) Average annual O&M =

36 $M = Average \ over \ 2016 - 2020 \left[\frac{0 \& M \cot by \ LOB \ asset \ group}{Gross \ book \ value \ by \ LOB \ asset \ group} \right]$

Using the 2016 - 2020 average O&M% reflects the present value of the annual O&M incurred at any
 point in the lifetime of the asset. This is because the expenses recorded in the data do not tie to a

¹⁰ PG&E's Charge 2020 tool was used to calculate the Generic Capital PVRR Multiplier for PG&E's 2023 GRC.

- particular asset, which does not give us information on the age of the asset when the expenses were
 incurred.
- The <u>Generic Lifetime O&M PVRR Multiplier</u> is the net present value of the annual O&M escalated at
 inflation over the book life of the asset
- 5 (16)
- 6 7

Generic Lifetime O&M PVRR Multiplier = $NPV_{discount \ factor}[M, ..., M * (1 + inflation)^{BookLife-1}]$

- 9 Where the book life is consistent with on standard assumptions made by PG&E's Economic Analysis
 10 department.¹¹
- If the user has information on the incremental costs of O&M of the specific program, for example from a vendor quote, then a Custom Lifetime O&M PVRR Multiplier can be provided.
- 13 If it can be assumed that there is no increase in O&M from the capital investment under the program,
- 14 for example replacing an existing asset with a new asset with the same type¹², the Custom Lifetime
- 15 O&M PVRR Multiplier can be set to zero. It is important to note that these O&M costs are incremental
- to what is already being paid for O&M in these asset classes. In some cases, the incremental O&M can
- 17 set to be negative, when an asset is being replaced with different asset type with lower lifetime O&M
- 18 costs.

19 3.2.3.2 Cost Allocation methods

- The following examples illustrate how costs are allocated for the two cost allocation methods "prorate by Program Exposure" or "% of Total Cost".
- 22
- If the cost allocation option "prorate by Program Exposure" is chosen then the total program cost will be allocated based on the program exposure, (e.g., miles for wildfire risk). This cost allocation works for
- 24 anotated based on the program exposure, (e.g., nines for whome risk). This is
 25 Program Exposures expressed in exposure units or work units.

26 **Example1 (cost allocation option = "prorate by Program Exposure"):**

27	Inputs:
28	 Total program cost: \$100M
29	 Program Exposure:
30	tranche 1: 100 miles
31	tranche 2: 300 miles
32	 Cost Allocation option: "prorate by Program Exposure"
33	Calculations:
34	 Cost allocation factor:
35	tranche 1: 100/400 = 25%
36	tranche 2: 300/400 = 75%
37	 final cost by tranche:
38	tranche 1: 25% * \$100M = \$25M
39	tranche 2: 75% * \$100M = \$75M

¹¹ For the purposes of this analysis, the inflation rate used was 3.0%, and the discount factor used was 7.0%. The book life of each asset group based on the Charge 2020 tool.

¹² We can assume no incremental O&M in this case since the O&M would be the same for a like-for-like asset replacement.

3

4

Remediation Program in the Large Uncontrolled Water Release Risk Event. 5 6 7 Example 2 (cost allocation option = "% of Total Cost (specify to the right)"): Inputs: 8 Total program cost: \$100M 9 • Program Exposure: 10 tranche 1: 100% 11 tranche 2: 100% 12 • Cost Allocation option: "prorate by Program Exposure" 13 • In this case, we know the specific cost on a Tranche level: 14 Tranche 1: \$40M 15 Tranche 2: \$60M 16 Thus, % of Total cost allocation factors would be specified as: 17 Tranche 1: 40/100 = 40% 18 Tranche 2: 60/100 = 60% 19 Note that in Example 2, if the option "prorate by program exposure" had been chosen then the cost 20 allocation factor will be erroneously calculated as: 21 tranche 1: 1/2 = 50%22 tranche 2: 1/2 = 50% 23 Tab 3-Eff – Frequency Programs 3.2.4 24 There are three tables in this tab. The first table, TableFreqPrograms, allows the user to specify the 25 remaining program characteristics by tranche, driver, sub-driver, and outcome. 26 Program ID: Unique identifier for the Program; this is a lookup via formula from the Summary of 27 Programs tab. Type: Whether the program is a Mitigation or Control; this is a lookup via formula from the 28 29 Summary of Programs tab. 30 Program: Input the program name exactly as written in the Summary of Programs tab. 31 Risk (for Cross Cutter Only): For Cross Cutting programs, the programs need to be mapped to a 32 particular Risk Event. Each program mapped to a particular Risk Event needs to have its own 33 row. 34 <u>Tranche</u>: If blank, the Tool will apply the program to the applicable tranches as specified in tab 35 1-Program Exposure. Specify tranches here ONLY IF the program effectiveness differs by tranche. If specified for one tranche, there should be as many rows as needed for all the 36 37 applicable tranches.

If the cost allocation option "'% of Total Cost (specify to the right)" is chosen then the total program cost

will be allocated based on the percentages provided by the user, regardless of the Program Exposure

provided. This option is utilized when costs do not scale with the risk exposure units, e.g. for Spillway

38 <u>Driver:</u> If the program applies to all the drivers of a Risk Event, leave blank. Otherwise, specify
 39 the applicable drivers for the program. If specified, there should be as many rows as needed for
 40 all the applicable drivers.

1 Subdriver: If the program applies to all the Subdrivers within a Driver, then leave this as blank. 2 Otherwise, specify the applicable subdrivers for the program. If specified, there should be as 3 many rows as needed for all the applicable drivers, and the Driver column must also be filled in. 4 Outcome: If the program applies to all the outcomes of a Risk Event, leave blank. Otherwise, 5 specify the applicable outcomes for the program. If specified for one outcome, there should be 6 as many rows as needed for all the applicable outcomes. 7 Does this use qualitative measure?: Select TRUE if the program effectiveness is quantified using 8 the Qualitative Methodology. Otherwise, select FALSE. The Qualitative Methodology is 9 described in more detail in Section 3.2.6. 10 Effectiveness – Quantitative: If Does this use gualitative measure? Is set to FALSE, then this cell 11 should contain the program effectiveness as a percentage. Otherwise, the value entered in this 12 cell will be ignored. 13 For program Type Mitigation, this percentage would be the percent risk reduction from the 14 Baseline Risk. 15 For program Type Control, this percentage would be the percent risk reduction from the 16 Inherent Risk. The effectiveness for controls will be converted to effectiveness relative to 17 Baseline Risk in the RSE Lite Tool as described in the methodology in Section 2. 18 <u>Category:</u> This is for computing the program effectiveness using the Qualitative Methodology. 19 Select the program category that best matches the program. 20 <u>Risk driver primarily due to...</u> This is for computing the program effectiveness using the 21 Qualitative Methodology. Select the option that best matches the drivers affected by the 22 program. 23 Explanation of Program Category and Risk Driver type: A required text field for the user to justify 24 the selections made for program Category and Risk driver type. 25 Effectiveness Cap (Ec): The maximum effectiveness of the program based on the selections 26 made for program <u>Category</u> and <u>Risk driver</u> type. 27 Maturity Factor (Mf): This is the discount factor on the Effectiveness Cap based on the user 28 responses to the Maturity Factor questionnaire, described in more detail in Section 3.2.6.2. This 29 value is required for Controls, but not for Mitigations. This is because a maturity assessment 30 cannot be performed for programs that have not yet been implemented. 31 To populate this cell, a separate tab named "Maturity Factor – <PRG#>" needs to be created for each of the Controls. The formula in this cell searches for a tab with <PRG#> matching the last 4 32 33 digits of the Control Program ID in that row, and pulls the Maturity Factor from that tab. 34 Effectiveness (Ec*Mf): If Does this use qualitative measure? Is set to TRUE, this is the 35 Effectiveness – Quantitative value. Otherwise, this is the Qualitative program effectiveness as 36 the product of Effectiveness Cap and Maturity Factor. For Mitigation programs, the Maturity 37 Factor defaults to 1, since a maturity assessment cannot be performed for programs that have 38 not yet been implemented.

1 2 3	<u>Benefit length (yrs)</u> : The (integer) number of years that the program benefits last beyond the implementation of the program in year YYYY. For example, a program implemented in 2021 with a 5-year benefit length would have risk reduction benefits for 2021 through 2025.
4 5	<u>Effectiveness degradation rate</u> : Specify the degradation rate based on the methodology described in <u>Effectiveness degradation method</u> .
6 7 8	Effectiveness degradation method: There are currently two types of supported degradation methods: 1. Esc: where $DF_{esc,k} = (1 - \deg R)^k$ for k in years 1,, <u>Benefit length</u> 2. Lineary where $DF_{esc,k} = 1 - \deg R + k$ for k in years 1 - Denefit length
9 10	2. Linear: where $DF_{linear,k} = 1 - degR * k$ for k in years 1,, <u>Benefit length</u> <u>Explanation of Benefit Length:</u> A required text field for the user to justify the <u>Benefit length</u> .
11 12	<u>Same benefit set across program?</u> : a validation cell that shows TRUE if the benefit length and degradation method are the same for all rows with the same <u>Program</u> .
13 14 15	<u>Risk ID:</u> Used by the model to filter and sort Cross Cutting Factor programs by Risk Event. References the <u>Risk (for Cross Cutter Only)</u> column. If this column is empty, the value defaults to the Risk Event Risk ID.
16 17	The second table <i>TableQualFreqEff</i> to the right of <i>TableFreqPrograms</i> is a reference table for the Qualitative Program <u>Effectiveness Cap</u> , described in more detail in Appendix 3.2.6.1.
18 19 20 21	The third table <i>TableFreqMapping</i> to the right of <i>TableQualFreqEff</i> is used in the Risk Model Input File for the Risk Event for data entry purposes. This table will be populated by the RSE Lite Tool when running the rse_input_automation.py script to import the inputs from the RSE Input File to the Risk Model Input File.
22 23 24	3.2.5 Tab 4-Eff – Conseq Programs There are three tables in this tab. The first table, <i>TableConseqPrograms</i> , allows the user to specify the remaining program characteristics by tranche, outcome, and subattribute.
25 26	<u>Program ID:</u> Unique identifier for the Program; this is a lookup via formula from the Summary of Programs tab.
27 28	<u>Type:</u> Whether the program is a Mitigation or Control; this is a lookup via formula from the Summary of Programs tab.
29	Program: Input the program name exactly as written in the Summary of Programs tab.
30 31 32	<u>Risk (for Cross Cutter Only):</u> For Cross Cutting programs, the programs need to be mapped to a particular Risk Event. Each program mapped to a particular Risk Event needs to have its own row.
33 34 35 36	<u>Tranche</u> : If blank, the Tool will apply the program to the applicable tranches as specified in tab 1-Program Exposure. Specify tranches here ONLY IF the program effectiveness differs by tranche. If specified for one tranche, there should be as many rows as needed for all the applicable tranches.

- <u>Outcome:</u> If the program applies to all the outcomes of a Risk Event, leave blank. Otherwise,
 specify the applicable outcomes for the program. If specified for one outcome, there should be
 as many rows as needed for all the applicable outcomes.
- <u>Attribute:</u> If the program applies to all the MAVF Attributes¹³ of a Risk Event <u>Outcome</u>, leave
 blank. Otherwise, specify the applicable attribute for the program. If specified, there should be
 as many rows as needed for all the applicable attributes.
- Does this use qualitative measure?: Select TRUE if the program effectiveness is quantified using
 the Qualitative Methodology. Otherwise, select FALSE. The Qualitative Methodology is
 described in more detail in Section 3.2.6.
- <u>Effectiveness Quantitative:</u> If <u>Does this use qualitative measure?</u> Is set to FALSE, then this cell
 should contain the program effectiveness as a percentage. Otherwise, the value entered in this
 cell will be ignored.
- For program <u>Type</u> Mitigation, this percentage would be the percent risk reduction from the
 Baseline Risk.
- For program <u>Type</u> Control, this percentage would be the percent risk reduction from the
 Inherent Risk. The effectiveness for controls will be converted to effectiveness relative to
 Baseline Risk in the RSE Lite Tool as described in the methodology in Section 2.
- 18 <u>Category:</u> This is for computing the program effectiveness using the Qualitative Methodology.
 19 Select the program category that best matches the program.
- <u>Consequence develops...</u> This is for computing the program effectiveness using the Qualitative
 Methodology. Select the option that best matches the how the consequences of the Risk Event
 or Cross Cutting Factor develops. More detail is provided in Section 3.2.6.1.
- Explanation of Program Category and Consequence type: A required text field for the user to
 justify the selections made for program <u>Category</u> and <u>Consequence</u> type.
- 25 <u>Effectiveness Cap (Ec)</u>: The maximum effectiveness of the program based on the selections
 26 made for program <u>Category</u> and <u>Risk driver</u> type.
- Maturity Factor (Mf): This is the discount factor on the Effectiveness Cap based on the user
 responses to the Maturity Factor questionnaire, described in more detail in Section 3.2.6.2. This
 value is required for Controls, but not for Mitigations. This is because a maturity assessment
 cannot be performed for programs that have not yet been implemented.
- To populate this cell, a separate tab named "Maturity Factor <PRG#>" needs to be created for each of the Controls. The formula in this cell searches for a tab with <PRG#> matching the last 4 digits of the Control <u>Program ID</u> in that row, and pulls the Maturity Factor from that tab.
- 34 <u>Effectiveness (Ec*Mf)</u>: If <u>Does this use qualitative measure?</u> Is set to TRUE, this is the
 35 <u>Effectiveness Quantitative</u> value. Otherwise, this is the Qualitative program effectiveness as

¹³ Details of the four Attributes of PG&E's Multi-Attribute Value Function: Safety, Electric Reliability, Gas Reliability, and Financial, can be found in Section 1.2 of the ERM Documentation

1 2 3	the product of <u>Effectiveness Cap</u> and <u>Maturity Factor.</u> For Mitigation programs, the Maturity Factor defaults to 1, since a maturity assessment cannot be performed for programs that have not yet been implemented.
4 5 6	<u>Benefit length (yrs):</u> The (integer) number of years that the program benefits last beyond the implementation of the program in year YYYY. For example, a program implemented in 2021 with a 5-year benefit length would have risk reduction benefits for 2021 through 2025.
7 8	<u>Effectiveness degradation rate</u> : Specify the degradation rate based on the methodology described in <u>Effectiveness degradation method</u> .
9 10 11	Effectiveness degradation method: There are currently two types of supported degradation methods: 3. Esc: where $DF_{esc,k} = (1 - \deg R)^k$ for k in years 1,, <u>Benefit length</u>
12	4. Linear: where $DF_{linear,k} = 1 - degR * k$ for k in years 1,, <u>Benefit length</u>
13	Explanation of Benefit Length: A required text field for the user to justify the Benefit length.
14 15	<u>Same benefit set across program?</u> : a validation cell that shows TRUE if the benefit length and degradation method are the same for all rows with the same <u>Program</u> .
16 17 18	<u>Risk ID:</u> Used by the model to filter and sort Cross Cutting Factor programs by Risk Event. References the <u>Risk (for Cross Cutter Only)</u> column. If this column is empty, the value defaults to the Risk Event Risk ID.
19 20	The second table <i>TableQualConseqEff</i> to the right of <i>TableConseqPrograms</i> is a reference table for the Qualitative Program <u>Effectiveness Cap</u> , described in more detail in Appendix 3.2.6.1.
21 22 23 24	The third table <i>TableConseqMapping</i> to the right of <i>TableQualConseqEff</i> is used in the Risk Model Input File for the Risk Event for data entry purposes. This table will be populated by the RSE Lite Tool when running the rse_input_automation.py script to import the inputs from the RSE Input File to the Risk Model Input File.
25 26 27 28 29	3.2.6 Qualitative Mitigation and Control Effectiveness Assessment (Optional) If a quantitative data or SME judgement is not available, a user can choose a qualitative method of program effectiveness. The qualitative method that PG&E developed as a last resort to use starts with an Effectiveness Cap, E_c , which describes the maximum effectiveness the Program can achieve for the specific Category and Driver or Consequence.
30 31 32 33 34	For a Control Program, the Effectiveness Cap is discounted by the Program Maturity Factor, M_f . This Maturity Factor includes consideration of staffing levels, ownership of the Program, records management, and other process related factors that are considered as important for control program in achieving its maximum effectiveness. The Maturity Factor is the product of 1 minus the individual discounts related to each of the questions related to maturity of the Control Program.
35	$(17)M_f = \prod_i (1 - M_i)$
36	Where M_f is the credit for each response to Question <i>i</i> .

36 Where M_f is the credit for each response to Question *i*.

- 1 Finally, Program Effectiveness, P_e, is then calculated as a product of all the variables calculated and
- 2 applied to the relevant driver or consequence selected for the Effectiveness Cap. Program Effectiveness
- 3 is represented as a percentage rounded up to the nearest whole number to avoid false precision. Note
- 4 that M_f is 1 for mitigations where the discount factor is not considered relevant.

5 (18)
$$P_e = E_c M_f$$

- 6
- 7 3.2.6.1 Program Effectiveness Cap (E_c)
- 8 Table 1 describes the Effectiveness Caps for programs that result in a reduction of Driver frequency.
- 9 Each row is a Category of program arranged in the order of the most effective type of program first to
- 10 the least effective type of program. Each column describes the primary Driver that the Program
- 11 addresses. The intersection of the Category row and the Driver Type column is the Effectiveness Cap.

Program Descrip	otion	R	isk Driver is Pri	imarily Due to	
CATEGORY	DESCRIPTION	HUMAN ERROR	FUNCTION AL FAILURE	MALICIOUS/ NEGLIGENT ACTION	NATURA FORCE
Elimination	Risk exposure is fully removed by implementing control or mitigation as long as program remains in place.	90%	90%	90%	90%
Engineered barrier	Program represents a barrier (e.g., physical, software) installed between the Risk Driver and Risk Event.	90%	75%	50%	50%
Substitution	Program implements a more effective tool or methodology to prevent risk exposure.	75%	50%	50%	0%
Administrative Barrier	Program implements human work practices and behaviors that reduce risk exposure.	30%	0%	0%	0%
Distance Gap	Program establishes an open boundary between Risk Driver and Risk Event.	20%	0%	0%	15%
Detect / Notify / Respond	Program introduces visibility or early detection of risk event or leading indicators which leads to prompt intervention or recovery.	10%	10%	25%	10%
Minor or Preventative Maintenance	Program repairs minor degradations identified through	0%	25%	5%	5%

12 Table 1: Effectiveness Cap (E_c) for programs affecting Driver frequency

	another process or on a preventative basis.				
Not Applicable	Program does not address exposure of the subject tranche or does not address the subject risk driver.	0%	0%	0%	0%

- 2 Table 2 describes the Effectiveness Caps for programs that result in a reduction on the impact of a
- 3 Consequence. Each row is a Category of program arranged in the order of the most effective type of
- 4 program first to the least effective type of program. Each column describes how the Consequence of the
- 5 Risk event manifests. A "gradually" developing consequence development generally means there is
- 6 sufficient time to attempt an evacuation or an opportunity to prevent customer impacts from a
- 7 reliability event (e.g., rerouting gas or power). All other consequence developments should be
- 8 considered prompt.
- 9 Table 2: Effectiveness cap (E_c) for programs modifying Consequences of the Risk Event

F	Program Description	Risk Event Conse	quences happen
CATEGORY	DESCRIPTION	RAPIDLY	GRADUALLY
		0 001	12001
Replacement	Program is in place such that impacts of consequences are able	90%	100%
	to be reduced through use of		
	another mechanism (e.g., re-		
	routing power).		
Engineered	Barrier (physical or software)	50%	75%
Barrier	installed between the Risk Event		
	and impacts.		
Automated	Program implements a	25%	50%
Response	mechanism such that automated		
	detection and response reduces		
	the impacts of the consequence.	100/	250/
Manual	Program implements a mechanism such that an	10%	25%
Response	automated or manual detection		
	method prompts a manual		
	response to the consequence.		
Not Applicable	Program does not address	0%	0%
	exposure of the subject tranche,		
	or does not address the subject		
	risk driver, or has no impact on		
	consequences.		

- 1 Some illustrative examples of Program categories, Driver types and Consequence Types are described in
- 2 Appendix A.1.

3 3.2.6.2 Program Maturity Factor M_f

- 4 Table 3 provides a questionnaire for determining the Maturity Factor. The Maturity Factor reduces the
- 5 Effectiveness Cap to account for process-related issues that may undermine the effectiveness of a
- 6 Control program. The percentages provided in each square represents the Maturity Factor percentage
- 7 discount, M_i , used in Equation 1. Note the input template attached to this guidance automatically
- 8 calculates the percentage discounts based on responses selected.

9 Table 3: Program Maturity Discount Factors (M_f) for Program process maturity

Que	estions		Responses	
		Α	В	С
1	Are there accountable control owners to oversee the end-to-end process?	(0%) One or more control owners in an	(10%) Multiple control owners across	(15%) No designated control owners
		organization	organization	Owners
2	Is staffing sufficient for executing the control?	(0%) Staffing is sufficient	(10%) Openings exist but control is maintained by current staffing	(15%) Staffing is insufficient to effectively implement control
3	Is training mandated for	(0%)	(10%)	(15%)
	process owners implementing the control?	Training is accredited and directly applicable	Training is not accredited or not directly applicable	Training is generic or does not exist
4	Are there open Internal Audit (IA) High Risk Findings?	(0%) No, all IA High Risk Findings are closed	(3%) IA High Risk Findings are open and corrective actions are in progress	(5%) IA High Risk Findings are still under investigation
5	Are there non-	(0%)	(3%)	(5%)
	conformances or violations (NC&V)?	NC&Vs are closed and no negative trend has been identified	NC&Vs are open and no negative trend has been identified	NC&Vs are open and trending is negative
6	Is a skillset mandated for	(0%)	(3%)	(5%)
	the control owner?	Control owner has a defined skillset filled by current owner	Control owner does not meet defined skillset or is interim	Skillset is generic or irrelevant
7	Is a skillset mandated for	(0%)	(3%)	(5%)
	personnel executing the control?	Personnel meet and have a defined skillset	Personnel do not meet defined skillset or are interim	Skillset is generic or irrelevant
8	Is there guidance on the control?	(0%) Guidance documents are up to date	(3%) Guidance documents exist but updates or	(5%)

			corrections are	Guidance documents
			needed	are inadequate or
			needed	aren't used
9	Are records in a template	(0%)	(3%)	(5%)
5	format and retained?	Templates are	Deficiencies have	Templates don't exist
	format and retained.	effective and retained	been identified with	or are used
		per Enterprise	templates or	inconsistently or
		Records &	retention	ineffectively
		Information		menceuvery
		Management (ERIM)		
		standards		
10	Is the control assessed by a	(0%)	(3%)	(5%)
	qualified internal party?	Independent internal	Internal assessments	Control is not
		assessment is	are performed but	assessed or
		performed at an	lack independence or	assessment items are
		appropriate interval	effectiveness	not addressed.
11	Is the control assessed	(0%)	(3%)	(5%)
	against the desired	Control is assessed	Control is assessed	Control is generically
	objectives and inherent	and open items are	but deficiencies are	assessed or not
	risk?	addressed	not timely addressed	assessed
12	Is data from the control	(0%)	(3%)	(5%)
	tracked and trended?	Data is effective and	Data is collected but	Data is not collected
		validated and helps	is not validated or	or is not relevant to
		drive implementation	inconsistently	control objective
			implemented	
13	Are metrics directly related	(0%)	(3%)	(5%)
	to the control and reported	Metrics are reported	Metrics do not reach	Metrics are not
	to leadership at an	to leadership and help	the appropriate level	reported or are
	appropriate interval?	inform decision-	of leadership or	ineffective for
		making	inconsistently inform	decision-making
			decision-making	purposes

2 Some illustrative examples of program maturity factor selections are described in Appendix A.2.

3 3.3 RUNNING THE MODEL

4 To run the RSE Lite Tool with the inputs provided in the RSE Lite File, provide the following input on the 5 RSE Lite tab of the RSE Lite File:

- 6 <u>Risk Data File Folder:</u> This is the file path to the folder containing both the Risk Data File and the 7 rse_lite.exe executable file.
- <u>Risk Data File Name:</u> This is the name (with file extension) of the Risk data file that contains the
 Test Year Baseline Risk data. This data file is an output of the Enterprise Risk Model.
- 10Risk Data File Path: This File path is generated via Excel formula and read in by the RSE Lite11script.

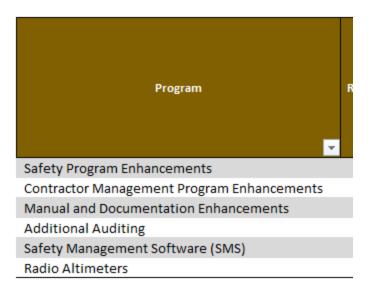
- 1 <u>RSE Lite exe path:</u> This File path is generated via Excel formula and read in by the RSE Lite script.
- 2 <u>NPV year:</u> The year to calculate the net present value of costs and risk reduction. *This cell is* 3 populated by EORM quant and should not be changed unless the user receives clearance to do
 4 so.
- 5 <u>Discount rate:</u> The discount rate used to calculate net present value of costs and risk reduction.
 6 This cell is populated by EORM Quant and should not be changed unless the user receives
 7 clearance to do so.
- 8 <u>Aggregation years:</u> The years over which the Program RSEs would be aggregated¹⁴. Enter the 9 start year in the first cell and the end year (inclusive) in the second cell. The third cell will 10 automatically populate with the aggregation period. *This cell is populated by EORM Quant and* 11 *should not be changed unless the user receives clearance to do so.*
- 12 3.3.1 Running for a single program on the RSE Lite tab.
- 13 This functionality is used to quickly assess different configurations of program characteristics such as
- 14 exposure, cost, effectiveness, etc. Additionally, a single program run can be used to diagnose input
- 15 issues.
- 16 Select a program from the drop-down menu in cell B12:

Program	
Select a Program to Run RSE L	ite
Safety Program Enhanceme	nts:
Run Complete for Safety Proar	

- 18 Once selected, click the "RUN" button to call the rse_lite.exe file.
- 19 The orange text under the program selection will provide status updates for the Tool run.
- 20 3.3.2 Running for multiple programs on the RSE Results tab
- 21 To run for multiple programs at once, use the RSE Results tab. Once program inputs are finalized, the
- 22 batch run function can be used to produce a report of annual RSEs at the program level.
- 23 Copy the names of the programs to be run in batch into the <u>Program</u> column of the table exactly as
- 24 written in the Summary of Programs tab.
- 25 Click "Start Batch Run".
- 26 The orange text above the table will provide status updates for the Tool run.

 $^{^{\}rm 14}$ For PG&E's 2023 GRC, the Aggregation years was the GRC period 2023-2026

Batch Run Complete 06/08 16:13 with v2.3.2 and risk data file SS_AVATN_20210421_20210421101007_TYBaselinePr oposed_rselite.xlsx.



- 2 3.3.3 Process for calculating Cross Cutting Factor program RSEs
- 3 The process to calculate Cross Cutting Factor (CCF) program RSEs require more coordination between
- 4 the CCF and Line of Business (LOB) teams that manage the Risk Events. This is to ensure that CCF effects
- 5 are properly modeled in the Risk Event, and the CCF program effects on the risks are accurately
- 6 captured. Calculating CCF program RSEs also rely on the Test Year Baseline data from the Risk Events
- 7 that they affect, and thus the program RSE calculations typically occur only after the Risk Event bowties
- 8 have been finalized.
- ⁹ First, the CCF and LOB teams work together to produce a Cross Cutter Mapping Table¹⁵ that maps the
- 10 Cross Cutters to the risks. Then, the CCF and LOB teams coordinate to find likelihood or consequence
- ¹¹ data that support the inclusion of CCFs into the LOB Risk Event bowtie.¹⁶
- ¹² If there are CCF programs that mitigate LoRE or CoRE of a Risk Event, then CCs will coordinate with LOBs
- ¹³ to fill out a CCF RSE Input Template with the program characteristics. Once the CCF program inputs are
- ¹⁴ specified and all TY Baseline Risk Data for applicable risks are available, the TY Baseline Risk Data for CCF
- ¹⁵ can be created by running a python script. The TY Baseline Risk Data is then used to run the RSE lite in
- ¹⁶ the RSE Input template of the CCF.

¹⁵ See Attachment B of Chapter 2 of PG&E's 2023 GRC Opening Testimony for a current Cross Cutter Mapping table.

¹⁶ The different ways Cross Cutting Factors show up in the Risk Event bowtie is detailed in the Risk Modeling WP-1.

1 **3.4** OUTPUTS

- 2 3.4.1 Tab RSE Results
- 3 The RSE Results tab shows summary results for all the programs specified during the batch run as
- 4 described in the procedure in Section 3.3.2. There are two tables in this tab *TableAllRSEs* and
- 5 *TableRSEbatch.* The NPV parameters are specified in the RSE Lite tab. See Section 3.3 for more
- 6 information.

7 3.4.1.1 TableAllRSEs

- 8
- 9 The *TableAllRSEs* table shows program level summary results.

Program	NPV Risk Reduction - 2020	NPV Risk Reduction - 2021	NPV Risk Reduction - 2022	NPV Risk Reduction - 2023	NPV Risk Reduction - 2024	NPV Risk Reduction - 2025	NPV Risk Reduction - 2026	NPV Risk Reduction - 2023-2026 Total	Risk Spend Eff - 2020	Risk Spend Eff - 2021	Risk Spend Eff - 2022	Risk Spend Eff - 2023	Risk Spend Eff - 2024	Risk Spend Eff - 2025	Risk Spend Eff - 2026	Risk Spend Eff - 2023- 2026 Total	NPV Capital Cost with PVRR (\$M) - 2023-2026		NPV Cost (\$M) - 2023-2026	NPV Free Reduction 2023-202
Safety Program Enhancements	· ·	16.45	15.37	19.08	17.83	16.67	15.58	69.16	-	35.50	34.80	45.30	44.42	43.54	42.69	44.04	*	1.57	1.57	8.92
																	-			
Contractor Management Program Enhancements		13.22	12.35	16.57	15.48	14.47	13.52	60.04		28.52	27.96	39.33	38.56	37.80	37.06	38.23		1.57	1.57	11.05
Manual and Documentation Enhancements		12.07	11.28	13.43	12.55	11.73	10.96	48.66		72.27	144.29	180.19	176.65	173.19	169.79	175.16	-	0.28	0.28	8.92
Additional Auditing		13.25	12.38	16.61	15.52	14.51	13.56	60.19		139.39	136.64	192.21	188.44	184.75	172.50	184.71		0.33	0.33	11.08
Safety Management Software (SMS)		11.79	11.02	13.09	12.23	11.43	10.68	47.44		210.63	206.49	257.26	252.22	247.27	230.88	247.22	-	0.19	0.19	8.69
Radio Altimeters		0.01	0.01	0.01	0.01	0.01	0.01	0.04		inf				0.0						

10

- implemented in year YYYY. It is detailed in Equation (10) of Section 2.4. This is the numerator for the
 <u>Risk Spend Eff YYYY.</u>
- Note that the risk reduction calculated for years prior to the TY Baseline year may be
 underestimated, since the TY Baseline LoRE or CoRE would already contain the risk reduction from
- this program¹⁷. For example, in the 2023 GRC the TY Baseline score for 2021 and 2022 already
 include the risk reduction¹⁸ from the program implemented in 2021. The NPV Risk Reduction for
- 18 2021 is then reducing risk from the TY Baseline score, which is a lower score than the Baseline score.
- <u>NPV Risk Reduction 2023-2026 Total</u> is the sum of NPV Risk Reduction for the years in the
 aggregation period, i.e. the GRC period 2023-2026, of the program risk reduction in Equation (10) of
 Section 2.4. This is the numerator of the <u>Risk Spend Eff 2023-2026 Total</u>.
- <u>Risk Spend Eff YYYY</u> is the RSE of the program implemented in year YYYY, calculated as the ratio of
 the net present value of annual risk reduction to the net present value of the costs as detailed in
 Equation (11) of Section 2.5.
- Risk Spend Eff 2023-2026 Total is the RSE of program implemented over the aggregation period,
 i.e. the GRC period 2023-2026 as detailed in Equation (12) of Section 2.5. It is calculated as the ratio
 of NPV Risk Reduction 2023-2026 Total to NPV Cost (\$M) 2023-2026.
- 30

^{11 • &}lt;u>NPV Risk Reduction – YYYY</u> is the net present value of the risk reduction from the program

¹⁷ See Figure 1-7 of the ERM Model Documentation and User Guide (Risk Modeling WP-1) for an illustration of the Baseline, TY Baseline, and Mitigated Score.

¹⁸ Since this risk reduction is calculated using the ERM, this would be the allocated portfolio-level risk reduction. For more detail, see Section 4.2.1 of the ERM Model Documentation and User Guide (Risk Modeling WP-1)

- <u>NPV Capital Cost with PVRR (\$M) 2023-2026</u> is the net present value of the capital costs incurred
 over the aggregation period, i.e. the GRC period 2023-2026, including the PVRR multiplier as
 described in Section 3.2.3.1.
- 4 5
- NPV Expense Cost (\$M) 2023-2026 is the net present value of the expense costs incurred over the
 aggregation period, i.e. the GRC period 2023-2026.
- 7

- NPV Cost (\$M) 2023-2026 is the sum of NPV Capital Cost with PVRR (\$M) 2023-2026 and NPV
 Expense Cost 2023-2026. This is the denominator to <u>Risk Spend Eff 2023-2026 Total.</u>
- <u>NPV Freq Reduction 2023-2026</u> is the net present value of the number of events avoided over the aggregation period, i.e. the GRC period 2023-2026.
- 13 *3.4.1.2 TableRSEbatch*
- 14

- 15 The *TableRSEbatch* table shows program outputs by tranche (or for Cross Cutting Factor programs, by
- 16 Risk Event). This table may be to the right of *TableAllRSEs* in the RSE Results tab. If a warning in the
- 17 *RunMessage* range reads "Batch output table does not exist in RSE Results tab. Writing detailed run
- 18 table to TableRSE in RSE Lite tab", then this table would be written to the Summary Results by Tranche
 19 in the RSE Lite tab. See a screenshot of part of the table below.
- 19 in the RSE Lite tab. See a screenshot of part of the table below.

20	m bela 2021 2022 2023 2023 2024 2025 2024 2025 2023 2023 2023 2023 2023 2023 2023	5.07 188.2 4606 66.76 12.86
21 22	Program is the name of the program	
23 24 25 26	<u>Index</u> is either the tranche name (for Risk RSE Input files) or the Risk Event Risk ID (for Cross Cutting Factor programs). The Risk Event corresponding to the Risk ID can be referenced in the Data & Validation tab.	
27 28 29 30	YYYY Program Risk Reduction NPV is the net present value of the tranche- or Risk-level risk reduction from the program implemented in year YYYY. The equation for NPV risk reduction is detailed in Section 2.4. This is the numerator for the YYYY - Risk Spend Eff.	n
31 32 33	The quantity <u>NPV Risk Reduction – YYYY</u> in <i>TableAllRSEs</i> is the sum over tranche for each program in this column.	I
34 35 36 37	<u>2023-2026 Program Freq Reduction NPV</u> is the net present value of the number of events avoided over the aggregation period, i.e. the GRC period 2023-2026. The <u>NPV Freq Reduction 2023-2026</u> in <i>TableAllRSEs</i> is the sum over tranche for each program in this column.	
38 39	2023-2026 Program Freq Risk Reduction NPV is the net present value of the tranche- or Risk-level Frequency Risk Reduction over the aggregation period, i.e. the GRC period 2023-2026. The	

- Frequency Risk reduction is calculated at the tranche- and year- level as described in Equation (4) of
 Section 2.3.
- <u>2023-2026 Program Conseq Risk Reduction NPV</u> is the net present value of the Consequence Risk
 Reduction over the aggregation period, i.e. the GRC period 2023-2026. The Consequence Risk
 reduction is calculated at the tranche- and year- level as described in Equation (6) of Section 2.3.
- 7

- 2023-2026 Program Risk Reduction NPV is the net present value of the tranche- or Risk-level Risk
 Reduction over the aggregation period, i.e. the GRC period 2023-2026. The Frequency Risk reduction
 is calculated at the tranche- and year- level as described in Equation (8) of Section 2.3. 2023-2026
 Program Risk Reduction NPV is the numerator for the 2023-2026 Program RSE calculation.
- 12
- <u>YYYY Program RSE</u> is the tranche- or Risk-level RSE of the program implemented in year YYYY,
 calculated as the ratio of the tranche- or Risk-level <u>YYYY Program Risk Reduction NPV</u> to the sum of
 the net present value of <u>CapEX USD YYYY</u> with PVRR and the net present value of <u>OpEx USD YYYY</u>.
- 16
- 2023-2026 Program RSE is the tranche- or Risk-level RSE of the program implemented over the aggregation period, i.e. the GRC period 2023-2026. It is calculated as the ratio 2023-2026 Program
 Risk Reduction NPV to the sum of the 2023-2026 Capital Cost NPV with PVRR and the 2023-2026
 Expense Cost NPV.
- <u>CapEx USD YYYY</u> is the nominal tranche- or Risk-level capital cost of the program implemented in year YYYY.
- 24

21

- PVRR Multiplier is the present value of revenue requirement multiplier to the net present value
 (NPV) of capital expenditure, representing the revenue requirement of a capital investment (O&M,
 depreciation, return on equity, etc.) over the lifetime of the asset. For more detail on the PVRR
 Multiplier calculation, see Section 3.2.3.1.
- 2023-2026 Capital Cost NPV with PVRR is the net present value of the tranche- or Risk-level capital costs incurred over the aggregation period, i.e. the GRC period 2023-2026, including the <u>PVRR</u>
 <u>Multiplier</u>. It is one of the terms of the denominator for <u>2023-2026 Program RSE</u>.
- 33
 34 OpEx USD YYYY is the tranche- or Risk-level nominal expense cost of the program implemented in year YYYY.
- 36
 37 2023-2026 Expense Cost NPV is the tranche- or Risk-level expense costs incurred over the aggregation period, i.e. the GRC period 2023-2026. It is one of the terms of the denominator for 2023-2026 Program RSE.

- 41 3.4.1.3 TableProgramRR
- 42
- 43 The batch run function also produces a table of program risk reduction by Risk, tranche and year. This

- 1 table may be to the right of *TableRSEbatch* in the RSE Results tab. If a warning in the *RunMessage* range
- 2 reads "Batch output table does not exist in RSE Results tab. Writing detailed run table to
- 3 TableProgramRR in RSE Lite tab", then this table would be written to the *Program Risk Reduction* table
- 4 in the RSE Lite tab. See a screenshot of part of the table below.

Program Risk Reduction

		Tranche	Yea	ar	Discount Factor	2021 Program Freq Reduction	2021 Program Freq Risk Reduction	Program Conseq	2021 Program Risk Reduction
	•		-	-	-	Ŧ	¥	T	-
		Fixed Wing -		2021	1	0.00685967	0.0318489	0.01743149	0.0460955
		Fixed Wing -		2022	0.9345794	0	0	0	(
		Fixed Wing -			0.8734387	0	0	0	(
		Fixed Wing -			0.8162979	0	0	0	(
		Fixed Wing -		2025	0.7628952	0	0	0	(
		Fixed Wing -		2026	0.7129862	0	0	0	(
		Helicopter -	-	2021	1	1.8164473	8.48478772	3.84072507	11.477034
		Helicopter -	-		0.9345794	0	0	0	(
		Helicopter -	-		0.8734387	0	0	0	(
		Helicopter -	-		0.8162979	0	0	0	(
		Helicopter -			0.7628952	0	0	0	
Salety Progra	INTAVAIN	Helicopter -	Care	2026	0.7129862	0	0	0	
		vont Dick ID	Itor Cr	acc Cui	Hing Eacto	r programa) The Dick D	wont corroc	nonding to
the Risk	ID can be r	eferenced ir	n the Da	ata & \	/alidation). The Risk E	vent corres	ponding to
the Risk	ID can be r		n the Da	ata & \	/alidation). The Risk E	vent corres	ponding to
the Risk Tranche 	ID can be r is the tran	eferenced ir	n the Da	ata & \ Im affe	/alidation	tab.			
the Risk <u>Tranche</u> <u>Year</u> is the Discount	ID can be r is the tran he year tha <u>t factor</u> is t	eferenced ir che that the	n the Da progra duction	ata & \ im affe i occur ie (NP\	/alidation ects is from the /) discount	tab. implement	tation of the	e <u>Program</u> ir	ı year YYYY
the Risk <u>Tranche</u> <u>Year</u> is the Discounter <u>YYYY Proc</u> impleme	ID can be r is the tran- he year tha <u>t factor</u> is t d in the RSE ogram Freq ented in YY	eferenced in che that the it the risk rea he net prese	n the Da progra duction ent valu d descu s the <u>Tr</u> uency	ata & \ im affe n occur ribed in ranche reduct	/alidation ects s from the /) discount n Section a -level Frec ion is calcu	tab. implement factor give 3.3. quency Redu ulated as th	tation of the en the discor uction in <u>Yea</u> e product o	e <u>Program</u> ir unt rate and <u>ar</u> for the pr f the <u>Tranch</u>	n year YYYY I NPV year ogram i <u>e</u> exposur

- 1 level as described in Equation (4) of Section 2.3.
- 2
- YYYY Program Conseq Risk Reduction is the Consequence Risk Reduction in Year for the program
 implemented in YYYY. The Consequence Risk reduction is calculated at the tranche- and year-level as
 described in Equation (6) of Section 2.3.
- 5 6 7
- YYYY Program Risk Reduction is the Total Risk Reduction in Year for the program implemented in
 YYYY. The Consequence Risk reduction is calculated at the tranche- and year-level as described in
 Equation (8) of Section 2.3.
- 9 10

20

23

- <u>YYYY Program Risk Reduction NPV</u> is the net present value is the Total Risk Reduction in <u>Year</u> for the
 program implemented in YYYY. It is the product of the <u>Discount factor</u> and the <u>YYYY Program Risk</u>
 <u>Reduction</u>
- 14
 <u>2023-2026 Program Freq Reduction</u> is the (undiscounted) sum of <u>YYYY Program Freq Reduction</u> over the aggregation period, i.e. the GRC period 2023-2026.
- 2023-2026 Program Freq Reduction NPV is the sumproduct of <u>Discount factor</u> and the <u>YYYY Program</u>
 Freq Reduction over the aggregation period, i.e. the GRC period 2023-2026.
- 2023-2026 Program Freq Risk Reduction is the (undiscounted) sum of <u>YYYY Program Freq Risk</u>
 <u>Reduction</u> over the aggregation period, i.e. the GRC period 2023-2026.
- 2023-2026 Program Freq Risk Reduction NPV is the sumproduct of <u>Discount factor</u> and the <u>YYYY</u>
 <u>Program Freq Risk Reduction</u> over the aggregation period, i.e. the GRC period 2023-2026.
- 26

29

- 27 2023-2026 Program Conseq Risk Reduction is the (undiscounted) sum of <u>YYYY Program Conseq Risk</u>
 28 <u>Reduction over the aggregation period</u>, i.e. the GRC period 2023-2026.
- 2023-2026 Program Conseq Risk Reduction NPV is the sumproduct of <u>Discount factor</u> and the <u>YYYY</u>
 <u>Program Conseq Reduction</u> over the aggregation period, i.e. the GRC period 2023-2026.
- 2023-2026 Program Risk Reduction is the (undiscounted) sum of <u>YYYY Program Risk Reduction</u> over
 the aggregation period, i.e. the GRC period 2023-2026.
- 35

- 2023-2026 Program Risk Reduction NPV is the sumproduct of <u>Discount factor</u> and the <u>YYYY Program</u>
 <u>Risk Reduction</u> over the aggregation period, i.e. the GRC period 2023-2026.
- 38
- 39 3.4.2 Tab RSE Lite
- 40 The RSE Results tab shows summary and detailed results for a single program after running the
- procedure described in Section 3.3.1. The NPV parameters are specified in the RSE Lite tab. See Section
 3.3 for more information.

1 3.4.2.1 Summary Results Table

- 2 The *Summary Results* table in the RSE Lite tab shows program level summary results for a single
- 3 program. For more explanation of the columns, see the description for *TableAllRSEs* in Section 3.4.1.1.

 Summary Results:
 NPV Rek
 NPV Rek

- 5 Program outputs by tranche (or for Cross Cutting Factors, by Risk Event) can be viewed for a single
- 6 program in the *Summary Results by Tranche* table in the RSE Lite tab. For more explanation of the
- 7 columns, see the description for *TableRSEbatch* in Section 3.4.1.2.

Summary Results by Tranche 2021 2022 2023 2024 2025 2026 2023-2026 2023-2026 2023-2026 2023-2026 2021 Program Program RSE Program Progra Program Program Program Program Program Program Program Consea Risk Risk Risk Risk Risk Risk Risk Risk Freq Frea Risk Reduction NPV Ŧ Fixed Wing - Patrol or Inspection 3 0.0 0.1 0.0 0.0 0 0.0 0.1 0 0 0 12.2 Helicopter - Cargo or Lift 11.4 13.5 12.6 11.8 11.0 34 18 49 154 Helicopter - Human External Carg 2.3 2.1 2.5 2.3 2.2 2.0 6 3 9 12 1 Helicopter - Insulator Wash 0.2 0.2 0.2 0.2 0.2 0.2 0 0 29 1 1 Helicopter - Passenger Ferry 0.1 0.1 0.1 0.1 0.1 0.1 0 8 0 0 0 Helicopter - Patrol or Inspection 2.6 17.4 2.4 2.7 2.5 2.3 2.2 10 16 Aggregated 16.3 19.1 17.8 167 15.6 9 49 25 69 38

9 More granular information can be found for a single program can be found in the remaining tables in the

10 RSE Lite tab.

- 11 3.4.2.2 Program Risk Reduction Table
- 12 The Program Risk Reduction table details the risk reduction by Tranche (or for Cross Cutting Factors, by
- 13 Risk Event) and by year of program benefit life for each program implementation year. For more
- explanation of the columns, see the description for *TableProgramRR* in Section 3.4.1.3.

Program Risk Reduction

Program Ri	isk ID	Tranche	Year	Discount Factor	2021 Program Freq Reduction	Freq Risk	2021 Program Conseq Risk Reduction	2021 Program Risk Reduction
-	-	•		r 🗸	v	~	~	-
Safety Program [A	VATN	Fixed Wing - Pat	202	1 1	0.00685967	0.0318489	0.01743149	0.0460955
Safety Program [A	VATN	Fixed Wing - Pat	202	2 0.9345794	. 0	0	0	0
Safety Program [A	VATN	Fixed Wing - Pat	202	3 0.8734387	0	0	0	0
Safety Program [A	VATN	Fixed Wing - Pat	202	4 0.8162979	0	0	0	0
Safety Program [A	VATN	Fixed Wing - Pat	202	5 0.7628952	0	0	0	0
Safety Program [A	VATN	Fixed Wing - Pat	202	6 0.7129862	0	0	0	0
Safety Program [A	VATN	Helicopter - Carg	202	1 1	1.8164473	8.48478772	3.84072507	11.477034
Safety Program [A	VATN	Helicopter - Carg	202	2 0.9345794	. 0	0	0	0
Safety Program [A	VATN	Helicopter - Carg	202	3 0.8734387	0	0	0	0
Safety Program [A	VATN	Helicopter - Carg	202	4 0.8162979	0	0	0	0
Safety Program [A	VATN	Helicopter - Carg	202	5 0.7628952	0	0	0	0
Safety Program [A	VATN	Helicopter - Carg	202	6 0.7129862	0	0	0	0

2 3.4.2.3 Risk Reduction per Unit Program Exposure Table

3 The *Risk Reduction per Unit Program Exposure* table breaks out the risk reduction calculation in the

4 Program Risk Reduction table by the LoRE and CoRE reduction components at the tranche, outcome,

5 and year level.

Risk ID	Tranche	Outcome Y	ear		Electric Reliability CoRE		Safety CoRE	LoRE Reduction per Unit Tranche Exposure	LoRE Reduction per Unit Tranche Exposure	LoRE Reduction per Unit Tranche Exposure		LoRE Reduction per Unit Tranche Exposure	LoRE Reduction per Unit Tranche Exposure	CoRE Reduction per Unit Tranche Exposure	CoRE Reduction per Unit Tranche Exposure
	¥	•	-	-	-	-	-	2021	2022	2023	2024	2025	2026	2021	2022
AVATN	Fixed Wing - Pa	trol Aggregate	2021	4.6433567	0.00086669	0.002813	4.639676908	7.405E-06	0) 0	0	C	C	0.4643357	. (
AVATN	Fixed Wing - Pa	trol Aggregate	2022	4.64335449	0.00086669	0.002811	4.639676908	3 0	7.405E-06	i 0	0	C	0) (0.4643354
AVATN	Fixed Wing - Pa	trol Aggregate	2023	5.34617025	0.000963	0.003123	5.342084032	. 0	0	8.513E-06	0	C	0) () (
AVATN	Fixed Wing - Pa	trol Aggregate	2024	5.34617025	0.000963	0.003123	5.34208403	. 0	0) 0	8.513E-06	C	C) () (
AVATN	Fixed Wing - Pa	trol Aggregate	2025	5.34617025	0.000963	0.003123	5.34208403	. 0	0) 0	0	8.513E-06	C) () (
AVATN	E 1110 E	trol Aggregate	2026	5.34617025	0.000000	0.003123	5.34208403	. 0	0) ()	0	0	8.513E-06	i (,

6

1

- <u>Risk ID</u> is the Risk Event Risk ID (for Cross Cutting Factor programs). The Risk Event corresponding to
 the Risk ID can be referenced in the Data & Validation tab.
- 9 10

• <u>Tranche</u> is the tranche that the program affects.

- 12 <u>Outcome</u> is the outcome associated with the risk event.
- 13

- <u>Year</u> is the year that the risk reduction occurs from the implementation of the program in year YYYY.
- 15

4		
1	•	<u>CORE</u> is the pre-mitigation consequence of the risk event associated with the <u>Tranche</u> , <u>Outcome</u> , and
2		<u>Year</u> . It is the sum of the <u>Electric (or Gas) Reliability CoRE</u> , <u>Financial CoRE</u> , and <u>Safety CoRE</u> .
3		
4	٠	Electric (or Gas) Reliability CoRE is the pre-mitigation CoRE associated with electric or gas reliability,
5		calculated using the multi-attribute value function (MAVF) ¹⁹ .
6		
7	•	Financial CoRE is the pre-mitigation CoRE associated with financial losses, excluding utility
8		shareholder financial interests, calculated using the multi-attribute value function (MAVF).
9		
10	•	Safety CoRE is the pre-mitigation CoRE associated with serious injury or fatality, calculated using the
11		multi-attribute value function (MAVF).
12		
13	•	LoRE Reduction per Unit Tranche Exposure YYYY is the LoRE reduction at the tranche- and outcome-
14		level for the <u>Year</u> from the implementation of the program in year YYYY. It is the sum over all
15		subdrivers of the quantity calculated in Equation (5) of Section 2.3.
16		
17	•	CoRE Reduction per Unit Tranche Exposure YYYY is the CoRE reduction at the tranche- and outcome-
18		level for the Year from the implementation of the program in year YYYY. It is the sum over all
19		attributes of the quantity calculated in Equation (7) of Section 2.3.
20		
21	•	LORE is the pre-mitigation likelihood of the risk event associated with the Tranche, Outcome, and
22		<u>Year.</u>
23		
24	•	Freq Risk Reduction per Unit Tranche Exposure YYYY is the Tranche- and Outcome-level Frequency
25		Risk Reduction in <u>Year</u> for the program implemented in YYYY. The Frequency Risk reduction is
26		calculated as LoRE Reduction per Unit Tranche Exposure YYYY multiplied by the CoRE.
27		
28	•	Conseq Risk Reduction per Unit Tranche Exposure YYYY is the Tranche- and Outcome-level
29		Consequence Risk Reduction in <u>Year</u> for the program implemented in YYYY. The Consequence Risk
30		reduction is calculated as <u>CoRE Reduction per Unit Tranche Exposure YYYY</u> multiplied by the <u>LoRE</u> .
31		
32	•	Risk Reduction per Unit Tranche Exposure YYYY is the Tranche- and Outcome-level Risk Reduction in
33		Year for the program implemented in YYYY. This quantity is calculated on the tranche- and year-
34		level as described in (8) of Section 2.3.
35		1.2.4 LoRE Reduction per unit of work each year, by Tranche, Outcome, Driver, Subdriver and Year
36	The	e LoRE Reduction per unit of work each year, by Tranche, Outcome, Driver, Subdriver and Year

37 provides more granular information on the LoRE reduction components.

 $^{^{\}rm 19}$ For more information on the MAVF, see

LoRE Reduction per unit of work each year, by Tranche, Outcome, Driver, Subdriver and Year.
Purely based on effectiveness, regardless of program exposure.

		based on effe	Tranche Ou		Subdriver	Year	Lore		Tranche Exposure	Freq	Yr	Туре	Adjust Effecti	ed Effective veness Life		radation	Effectiveness Degradation Method		Reduction
		Pro: AVATN Pro: AVATN			ent Fa Aggregated ent Fa Aggregated					0.004235285		2021 Mitigation 2022 Mitigation		0.1	1		esc esc	0.	1 4.5297E-07 0 0
	Safety	Pro AVATN Pro AVATN	Fixed Wing - Avi	iation In Equipme	ent Fa Aggregated ent Fa Aggregated	l .	2023 8.28	8477E-06	935.0033	0.007746291		2023 Mitigation 2024 Mitigation		0.1 0.1	1	C	esc esc		0 0
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Ŧ	Salety	TIQAVAIN	Fixed Wing - Avi	ation mequipm	ent ra Aggregateu		2020 8.20	54772-00	555.0055	0.007740291		2020 Wildgation		0.1	1		/ esc		0 0
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7	•	Trane	<u>che</u> is th	e trano	che that	t the	e prog	gram	n affe	ects.									
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9	•	Outo	<u>ome</u> is t	he out	come a	ssor	iater	1 wit	h the	o risk e	ven	t							
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10																			
11	•	Drive	<u>er</u> is the	risk ev	ent driv	/er a	ffect	ed b	y the	e progr	am.								
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13	•	Subd	river is t	the risł	k event	subo	drive	r affe	ected	d by th	e pr	ogram.							
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32		Tran	<u>che, Out</u>	<u>tcome,</u>	Driver,	<u>Sub</u>	drive	<u>er</u> an	id <u>Ye</u>	<u>ar</u> leve	el. Tł	ne effec	tive	ness as	inpu	ıt by	the us	ser in T	Гаb 3-
33		Eff (s	ee Secti	ion 3.2	.4) is ad	ljust	ed fo	or the	e pro	gram e	expo	osure ar	nd th	ie annu	ial de	egra	dation		
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36		imple	ementat	TO UDI	the pro	grar	niny	year	YYYY	. I NIS I	is th	ie same	ast	ne <u>Ben</u>	entl	engt	n (yrs)	speci	nea in

1 Tab 3-Eff (see Section 3.2.4).

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- <u>Effectiveness Degradation Rate</u> is the degradation rate based specified in Tab 3-Eff (see Section 3.2.4).
- <u>Effectiveness degradation method</u> is the effectiveness degradation method specified in Tab 3-Eff
 (see Section 3.2.4).
- <u>YYYY Tranche Average Effectiveness</u> is the <u>Adjusted Effectiveness</u> at the <u>Tranche</u>, <u>Outcome</u>, <u>Driver</u>,
 <u>Subdriver</u> and <u>Year</u> level for the program implemented in YYYY.
- LORE Reduction per Unit Tranche Exposure YYYY is the LORE reduction at the Tranche, Outcome,
 Driver, Subdriver and Year level for the program implemented in YYYY. It is calculated as the product
 of YYYY Tranche Average Effectiveness and LORE, as detailed in Equation (5) of Section 2.3.
- 14 *3.4.2.5* CoRE Reduction per unit of work each year, by Tranche, Outcome, Driver and Attribute
- 15 The CoRE Reduction per unit of work each year, by Tranche, Outcome, Driver and Attribute provides
- 16 more granular information on the CoRE reduction components.

CoRE Reduction per unit of work each year, by Tranche, Outcome, Driver and Attribute.

Index	Risk ID	Tranche	Outcome Year	Attribute		Tranche Exposure	Yr	Туре	Adjusted Effectiveness		Effectiveness Degradation Rate	Effectiveness Degradation Method	Average Effectiveness	Reduction per Unit Tranche Exposure	2022 Tranche Average Effectiveness
-		т Т	-	v	-	Ŧ		•	-	-	-	-		2021	-
Safety Pro	AVATN	Fixed Wing	Aviation In	2021 Financial	0.001388	935.0033	20	21 Mitigation	0.1	1	. 0	esc	0.1	0.000138782	0
Safety Pro	AVATN	Fixed Wing	- Aviation In	2021 Safety	4.639243	935.0033	20	21 Mitigation	0.1	. 1	. 0	esc	0.1	0.463924284	C
Safety Pro	AVATN	Fixed Wing	- Aviation In	2022 Financial	0.001387	935.0033	20	22 Mitigation	0.1	. 1	. 0	esc	0	0	0.1
Safety Pro	AVATN	Fixed Wing	Aviation In	2022 Safety	4.638809	935.0033	20	22 Mitigation	0.1	. 1	. 0	esc	0	0	0.1
Safety Pro	AVATN	Fixed Wing	- Aviation In	2023 Financial	0.001541	935.0033	20	23 Mitigation	0.1	. 1	. 0	esc	0	0	C
Safety Pro	AVATN	Fixed Wing	- Aviation In	2023 Safety	5.341042	935.0033	20	23 Mitigation	0.1	. 1	. 0	esc	0	0	0
Safety Pro	AVATN	Fixed Wing	- Aviation In	2024 Financial	0.001541	935.0033	20	24 Mitigation	0.1	. 1	. 0	esc	0	0	0
Safety Pro	AVATN	Fixed Wing	Aviation In	2024 Safety	5.341042	935.0033	20	24 Mitigation	0.1	. 1	. 0	esc	0	0	0
Safety Pro	AVATN	Fixed Wing	- Aviation In	2025 Financial	0.001541	935.0033	20	25 Mitigation	0.1	. 1	. 0	esc	0	0	C
Safety Pro	AVATN	Fixed Wing	- Aviation In	2025 Safety	5.341042	935.0033	20	25 Mitigation	0.1	. 1	. 0	esc	0	0	C
Safety Pro	AVATN	Fixed Wing	- Aviation In	2026 Financial	0.001541	935.0033	20	26 Mitigation	0.1	. 1	. 0	esc	0	0	0
Safety Pro	AVATN	Fixed Wing	Aviation In	2026 Safety	5.341042	935.0033	20	26 Mitigation	0.1	1	. 0	esc	0	0	C

- 18 Index is a reference column used by the RSE calculation code
- 19

17

- <u>Risk ID</u> is the Risk Event Risk ID (for Cross Cutting Factor programs). The Risk Event corresponding to
- 21 the Risk ID can be referenced in the Data & Validation tab.
- 22
- 23 <u>Tranche</u> is the tranche that the program affects.
- 24
- 25 <u>Outcome</u> is the outcome associated with the risk event.
- 26

28

- <u>Year</u> is the year that the risk reduction occurs from the implementation of the program in year YYYY.
- <u>Attribute</u> is the applicable MAVF attribute (Safety, Electric Reliability, Gas Reliability, Financial) that
 is affected by the program.

1 CoRE is the pre-mitigation consequence of the risk event per unit exposure associated with the • 2 Tranche, Outcome, Attribute and Year. 3 4 Tranche Exposure is the risk exposure (in exposure units specified in the Risk Input File) of the • 5 Tranche 6 7 Yr is the numerical form of Year, used by the RSE calculation code. It is output here for debugging 8 purposes. 9 10 <u>Type</u> is the program type, i.e. whether it is a Mitigation or Control • 11 12 • Adjusted Effectiveness is the effectiveness of the program in reducing risk per unit exposure on the Tranche, Outcome, Driver, Subdriver and Year level. The effectiveness as input by the user in Tab 4-13 14 Eff (see Section 3.2.5) is adjusted for the program exposure and the annual degradation. 15 16 Effectiveness Life is the (integer) number of years that the program benefits last beyond the 17 implementation of the program in year YYYY. This is the same as the Benefit length (yrs) specified in 18 Tab 4-Eff (see Section 3.2.5). 19 20 Effectiveness Degradation Rate is the degradation rate based specified in Tab 4-Eff (see Section 3.2.5). • 21 22 Effectiveness degradation method is the effectiveness degradation method specified in Tab 4-Eff • 23 (see Section 3.2.5). 24 25 YYYY Tranche Average Effectiveness is the Adjusted Effectiveness at the Tranche, Outcome, Driver, 26 Subdriver and Year level for the program implemented in YYYY. 27 28 • CoRE Reduction per Unit Tranche Exposure YYYY is the CoRE reduction at the Tranche, Outcome, 29 Attribute and Year level for the program implemented in YYYY. It is calculated as the product of YYYY 30 Tranche Average Effectiveness and CoRE, as detailed in Equation (7) of Section 2.3. 31

32 APPENDIX

33 A. QUALITATIVE METHODOLOGY DETAILS

- 34 A.1. EFFECTIVENESS CAP EXAMPLES
- 35 Driver Program Category
- Elimination
- 37 o Undergrounding a line eliminates the potential for a downed wire due to vegetation
 38 incursion.

1		• Decommissioning and removing a dam eliminates the potential for dam failure.
2		 Removing a gas line in an area eliminates the potential for a dig-in.
3	•	Engineered barrier
4		 A firewall is installed in a network system to prevent intrusion.
5		 A cover is placed over a switch to prevent accidental manipulation.
6		 A chain link fence is installed to prevent intrusion.
7		• A diode is installed to prevent outside parties from manipulating electronic controls.
8	•	Substitution
9		 A tool used by personnel is replaced to allow work to be performed safer and easier.
10		 A second pump is installed to ensure flow is able to be maintained.
11		 A backup valve is installed to ensure flow can be stopped in an emergency.
12		 Critical equipment is moved to a more secure location to prevent physical attack.
13	•	Administrative Barrier
14		 Employees are mandated to use circle/slash in a procedure to prevent errors when
15		performing a procedure that could lead to a risk event.
16		• Three-way communication is utilized to ensure communication is clearly understood
17		during a high risk evolution.
18	•	Distance Gap
19		• Tape is placed on a floor to demonstrate a safe area for personnel to stand away from a
20		hazard.
21		 Vegetation is cleared to a certain distance to prevent contact with power lines.
22	•	Detect / Notify / Respond
23		 Inspections are performed and resulting issues identified are promptly addressed.
24		 An automated system alerts an operator to take action to prevent a risk event from
25		occurring.
26		 Security cameras are installed and monitored to identify and respond to intruders.
27	•	Minor or Preventative Maintenance
28	•	 Regular testing and maintenance is performed on critical equipment to ensure
28 29		reliability.
30		
30 31		 Chain link fencing is regularly tensioned and rust and other degradations are addressed. Equipment is serviced or replaced at Original Equipment Manufacturer (OEM)
32		recommended intervals.
52		
33		Risk Driver Attribute
34	•	Human Error
35		 Operator error leads to overpressurization of a gas line.
36		 Excessive and unmonitored pumping leads to overtopping of a dam.
37	•	Functional Failure
38		• A pump fails to start either by manual action from an operator or expected automated
39		response.
40		 A valve operator fails to open a valve either by manual action from an operator or
41		expected automated response.
42		 Software crashes.
43	-	Malicious / Negligent Action
40	•	

1		 A drunk driver runs into a pole.
2		 A nation-state attacker sabotages critical infrastructure.
3		 A cyber attacker installs ransomware on internal systems.
4		 A contractor digs into a buried gas line.
5	•	Natural Force
6		 Sudden rains on snowpack leads to flooding.
7		 High winds.
8		 Flow accelerated corrosion and cracking.
9		\circ Thermal cycling.
10		Consequence Program Attribute
11	•	Replacement
12		 Power or gas is rerouted so that an outage is momentary or undetectable.
13		• Control systems are relocated outside of the flood zone to allow operators to safely
14		control equipment during an event.
15	•	Engineered Barrier
16		• A seawall is installed so that a tsunami does not incur on critical equipment.
17		• An infected system is isolated to prevent spread of a computer virus.
18	•	Automated Response
19		• An automated system detects a sudden loss of gas pressure and closes the supply valve
20		to the affected line.
21		 A turbine overspeed is detected and forces the turbine to trip.
22	•	Manual Response
23		• SCADA system detects high flows and triggers an alarm to prompt operators to take
24		action.
25		\circ A member of the public alerts authorities to a downed wire.
26		Risk Event Consequence Development
27	•	Rapid
28		 People living within 30 minutes of the flood zone after a dam failure may not have
29		adequate time to evacuate after a dam failure.
30		 A dig in results in unexpected rupture and ignition of a gas line.
31	•	Gradual
32		 A wildfire develops away from a population center and people in threat are able to be
33		evacuated prior to the wildfire approaching.
34		• Insufficient power is forecasted by the CallSO and warnings are able to be issued to alert
35		the populace to potential outages.
36	A.2.	MATURITY FACTOR RESPONSE EXPLANATIONS
37	1.	Are there accountable control owners to oversee the end to end process?
38		a. One or more control owners in an organization. Centralized accountable owners have
39		full visibility to the process required to fully execute the control.
40		b. Multiple control owners across organization. Decentralized owners or overlapping
41		responsibilities can result in gaps in process ownership.

1		с.	No designated control owners. Control is executed by staff, but owners have either
2			departed or are not designated so ownership and oversight is unclear or nonexistent.
3	2.	ls staffi	ing sufficient for executing the control?
4		a.	Staffing is sufficient. Control is being executed by current staff, and while openings may
5			exist, it does not strain the execution of the control.
6		b.	Openings exist but control is maintained by current staffing. Control is being executed
7			by current staff, but gaps in staffing result in current staff taking on a number of
8			additional responsibilities which may not be sustainable or may lead to errors.
9		с.	Staffing is insufficient to effectively implement control. Control is still being executed,
10			but personnel executing the control have to assume numerous roles, are strained, and
11			may often miss deadlines or perform insufficiently due to excessive loading.
12	3.	ls traini	ing mandated for process owners implementing the control?
13		a.	Training is accredited and directly applicable. Owners of the control have been trained
14			to execute the specific control and the training itself has been validated as effective or
15			applicable.
16		b.	Training is not accredited or not directly applicable. Owners of the control have been
17			trained, but the control is covered only briefly or in part, or the training has not been
18			reviewed for effectiveness or applicability.
19		с.	Training is generic or does not exist. Owners of the control have not been trained for
20			executing the control and rely upon passed down knowledge or learning through
21			execution of the control.
22	4.	Are the	re open Internal Audit (IA) High Risk Findings?
23		a.	No, all IA High Risk Findings are closed. IA High Risk Findings have been resolved or have
24			not been found. This option may be selected if IA does not evaluate the program, but
25			follow up should be performed to ensure IA has had the opportunity to audit the
26			program.
27		b.	IA High Risk Findings are open and corrective actions are in progress. IA High Risk
28			Findings are open but on track to timely resolution.
29		с.	IA High Risk Findings are still under investigation. IA High Risk Findings have recently
30			been discovered or have not been investigated to determine closure path.
31	5.	Are the	re non-conformances or violations (NC&V)?
32		a.	NC&Vs are closed and no negative trend has been identified. NC&Vs have been
33			investigated and resolved. Further, NC&Vs are trended and have not been found to
34			indicate a gap in the control. This option may be selected if the control does not receive
35			regulatory oversight.
36		b.	NC&Vs are open and no negative trend has been identified. NC&Vs are being addressed
37			but open issues still require resolution to close identified gaps in execution of the
38			control. Further, NC&Vs are trended and have not been found to indicate further gaps
39			in the control exist.
40		с.	NC&Vs are open and trending is negative. NC&Vs are open and are not being addressed
41			to resolution. Further, trending of NC&Vs is not being performed or are indicative of
42			gaps in execution of the control.
43	6.	ls a skil	lset mandated for the control owner?

1		a.	Control owner has a defined skillset filled by current owner. Owner(s) of the control
2			meet expectations necessary to provide ownership and oversight of the control.
3		b.	Control owner does not meet defined skillset or is interim. Owner(s) of the control do
4			not meet expectations for providing ownership or oversight of the control or have been
5			temporarily elevated to the position until the position can be filled.
6		c.	Skillset is generic or irrelevant. Necessary skillset for owner(s) of the control has not
7			been defined or there are no control owners.
8	7.	ls a skil	llset mandated for personnel executing the control?
9			Personnel meet and have a defined skillset. Personnel executing the control meet
10			expectations necessary to be relevant subject matter experts (SMEs) for implementing
11			the control.
12		b.	Personnel do not meet defined skillset or are interim. Personnel executing the control
13			do not meet expectations necessary to be considered SMEs for implementing the
14			control or may be temporarily filling roles to ensure the control is able to be executed.
15		c.	Skillset is generic or irrelevant. Necessary skillset for personnel executing the control
16			has not been defined.
17	8.	Is there	e guidance on the control?
18			<i>Guidance documents are up to date.</i> Guidance documents are used to implement the
19			control and are able to be consistently followed by personnel executing the control.
20		b.	<i>Guidance documents exist but updates or corrections are needed.</i> Guidance documents
21			are used to implement the control and able to be followed to execute the control,
22			however they cannot be consistently followed for full implementation, are out of date,
23			or have known gaps or workarounds.
24		c.	<i>Guidance documents are inadequate or aren't used.</i> Guidance documents are not used
25			to implement the control, do not exist, or are inadequate and unable to be followed.
26	9.	Are rec	ords in a template format and retained?
27		a.	Templates are effective and retained per Enterprise Records & Information Management
28			(ERIM) standards. Templates are used for collecting data from the control which allows
29			for appropriate follow-up and trending. The templates are then stored per company
30			standards to ensure appropriate recordkeeping.
31		b.	Deficiencies have been identified with templates or retention. Templates are used but
32			require rework for effective implementation and trending of control. The templates are
33			inconsistently stored or ERIM assessment of retention methods have found deficiencies.
34		с.	Templates don't exist or are used inconsistently or ineffectively. Data collected through
35			implementation of control is inconsistently documented and issues may not be easily
36			identified for remediation.
37	10.	Is the c	control assessed by a qualified internal party?
38		a.	Independent internal assessment is performed at an appropriate level. An independent
39			party with the implementing organization assesses the effectiveness of the control. For
40			example, departments providing quality verification or Compliance Maturity Controls
41			Testing.
42		b.	Internal assessments are performed but lack independence or effectiveness. Personnel
43			performing the control or control owners regularly evaluate the control to ensure
44			completeness of the control.

1	c. Control is not assessed or assessment items are not addressed. Control is performed
2	without internal assessment, or assessments are performed but issues identified are not
3	investigated and addressed.
4	11. Is the control assessed against the desired objectives and inherent risk?
5	a. <i>Control is assessed and open items are addressed</i> . Assessments performed on this
6	control are directed towards ensuring control's effectiveness and do not roll up the
7	control with other programs such that the control is indistinguishable.
8	b. <i>Control is assessed but deficiencies are not timely addressed.</i> Assessment is performed
9	as described, but issues identified are not clearly tracked to resolution.
10	c. <i>Control is generically assessed or not assessed</i> . Assessment rolls up control into several
11	other programs and does not directly address goals of the control, or control is not
12	assessed internally.
13	12. Is data from the control tracked and trended?
14	a. Data is effective and validated and helps drive implementation. Data is collected and
15	clearly usable for purposes of the control. Further, data is regularly reviewed to ensure
16	it is trended and issues identified are addressed.
17	b. Data is collected but is not validated or inconsistently implemented. Data is collected
18	but gaps in collection have been identified or review and validation is performed
19	inconsistently. The data is still clearly usable for the intended purposes of the control.
20	c. Data is not collected or is not relevant to control objective. Data collection is
21	inconsistent or issues identified don't often reach resolution. No trending or reviews
22	are performed.
23	13. Are metrics directly related to the control and reported to leadership at an appropriate interval?
24	a. Metrics are reported to leadership and inform decision-making. Metrics are clear and
25	comprehensive and reported to leadership directly to allow leadership action prior to
26	degradation of risk and control.
27	b. Metrics do not reach the appropriate level of leadership or inconsistently inform
28	decision-making. Metrics are not clearly visible to a level of leadership that can
29	remediate issues with the control or risk.
30	c. Metrics are not reported or are ineffective for decision-making purposes. No metrics
31	exist for the control or are rolled up such that no visibility for the risk or control is
32	achievable.