PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response

PG&E Data Request No.:	OEIS_002-Q008		
PG&E File Name:	WMP-Discovery2023_DR_OEIS_002-Q008		
Request Date:	April 13, 2023	Requester DR No.:	P-WMP_2023-PG&E-002
Date Sent:	April 18, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Colin Lang

SUBJECT: REGARDING PG&E'S ENHANCED IGNITION ANALYSIS (EIA) PROGRAM

QUESTION 008

a. How many ignitions were evaluated via PG&E's EIA program in 2021, 2022, and 2023 (if applicable) respectively?

b. When would PG&E perform an EIA?

c. Provide an example of an ignition PG&E performed EIA for, including supporting documentation and reports as applicable.

d. Via Excel format, provide the following information for each ignition in which PG&E performed an EIA, following the same definitions as Table 6 of the QDR:

   i. CPZ in which ignition occurred

   ii. HFTD Tier

   iii. Date of ignition

   iv. Qualifier for performing EIA (HFTD tier, EPSS protected facility, etc.)

   v. Metric type

   vi. Ignition driver

   vii. Line type

   viii. Summary/detail on the cause of ignition as identified via EIA

ANSWER 008

a. We completed EIA evaluative actions for 118 ignitions in 2021; we established the EIA program in 2021 and the scope/breadth of these evaluations may vary. Under the EIA program, we completed 147 ignition evaluations in 2022, and 17 ignition evaluations year-to-date in 2023.

b. As outlined in our Utility Procedure: RISK-6306P-02 Fire Incident Enhanced Ignition Analysis Procedure (first published in September 2022), ignitions with these conditions meet EIA criteria:

   - PG&E Facility Ignitions in a High Fire Risk Area (HFRA) or High Fire Threat District (HFTD)

Note: Facility ignitions caused by insulator tracking that do not result in a CPUC reportable ignition will not be included in-scope for Enhanced Ignition Analysis.

- Ignitions on an Enhanced Powerline Safety Settings (EPSS) enabled circuit protection zone (CPZ)
- All CPUC Reportable Transmission and Substation Ignitions

The EIA Program may not perform some or all of the activities described in the above-mentioned Procedure if the ignition investigation is being performed under the direction of counsel.

c. We are attaching three reports associated with ignition #20220450 as an example of typical EIA work products.

1. WMP-Discovery2023_DR_OEIS_002-Q008Atch01CONF.pdf;
2. WMP-Discovery2023_DR_OEIS_002-Q008Atch02.pdf; and
3. WMP-Discovery2023_DR_OEIS_002-Q008Atch03CONF.pdf

This ignition occurred on April 18th, 2022 because of an improperly installed connection device. As a result of this fire, we proactively replaced additional connection devices and jumpers from the incident circuit, and are in the process of revising guidance documents related to connection device installation methods. The reports include the following: (1) A Preliminary Ignition Investigation Report [PIIR] with event details and location history, (2) material analysis report produced by Applied Technology Services department [ATS] identifying the suspected failure mode, and (3) an Extent of Condition Report produced by our Asset Strategy department related to corrective and evaluative actions associated with that failure mode.

d. Please see *"WMP-Discovery2023_DR_OEIS_002-Q008Atch04.xlsx"* for table of ignitions where PG&E has completed EIA related evaluative actions. Note the following:

1. The list contains events where CPUC reportability may not have been met and ignitions where the suspected cause of the fire was not PG&E assets through the EIA process. We added CPUC reportability to the attached table for reference.
2. We used the data schema from the 2023 Q1 QDR Table 6 template for 'Metric Type' and 'Ignition Driver'.
3. Given the volume of ignitions, we are not able to provide a summary of each event in the allotted time to respond to this data request. Given additional time, we could review each incident and provide a short description of the event upon request.