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Via Office of Energy Infrastructure Safety E-Filing

Shannon O'Rourke, Deputy Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Pacific Gas & Electric Company's (PG&E) Report on Updated EPSS reliability impact study per ACI 22-32

Dear Deputy Director O'Rourke:

Pursuant to Revised Table 7-3-1 in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP), PG&E submits the following documents in regards to objective GM-07 – Updates on Enhanced Powerline Safety Settings (EPSS) Reliability Study, which is to provide annually an updated EPSS reliability study per ACI PG&E 22-32.

- An Excel report of the Annual EPSS Reliability Study for 2023
- A supporting narrative of the Annual EPSS Reliability Study

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Very truly yours,

_____/S/_____

Jay Leyno

Director, Wildfire Mitigation PMO

2024 WMP Commitment GM-07 (EPSS Reliability Study): Narrative

This document serves as a narrative companion to the 2023 EPSS Reliability Study – primarily to provide information on the commitment that isn't appropriate for the excel spreadsheet format.

- Resource Constraints (access issues, staffing numbers, etc.):
 - PG&E has not previously identified resource constraints that prevented it from meeting or exceeding established metrics for Customer Average Interruption Duration Index (CAIDI).
 - PG&E has established a plan to ensure appropriate resources are available to support response to EPSS outages to meet both its response metrics and outage duration metrics.
- PG&E must also provide an updated plan of actions being taken based on the analysis performed in its EPSS reliability impact study to reduce reliability and safety impacts of EPSS:
 - PG&E leverages the information included in the attached 2023 EPSS Reliability Study to inform activities meant to improve reliability for customers experiencing outages on circuits protected by EPSS. PG&E is evaluating operational mitigations executed in 2023 in combination with information in the 2022 and 2023 EPSS Reliability Study to review reliability impacts and potential improvement in support of future mitigation work scoping and further reducing outage activity on EPSS enabled zones.
 - In 2024, PG&E will continue to execute targeted vegetation management work, Vegetation Management for Operational Mitigations (VMOM), intended to reduce the impacts of vegetation caused outages due to increased sensitivity resulting from EPSS enabled devices. Additionally, we will continue to execute our Vegetation Extent of Condition patrols and vegetation management work for EPSS enabled vegetation caused outages to: (1) determine if there are additional vegetation risks upstream and downstream of the fault location; and (2) attempt to remove any identified vegetation.
 - In addition to vegetation management work, PG&E will execute animal mitigation work for EPSS enabled animal caused outages. Animal mitigation may include installation of bird retrofitting, critter guard and additional measures depending on asset configuration.
 - PG&E will continue to leverage EPSS reliability information in support of circuit sectionalization efforts and in 2024 plans to begin installation of FuseSaver equipment with the intent to decrease customer impact from outages on EPSS enabled zones. In addition to wildfire risk, PG&E will assess reliability impact of proposed zones to help inform prioritization.
 - The information included in the 2023 EPSS Reliability Study is also used to help improve our customer communication and engagement at the service point identification level including identification of our highest impacted customers and support offerings available. In 2023, the EPSS program experienced a Customer Average Interruption Duration Index (CAIDI) of 193 minutes, or just over 3 hours.