Pacific Gas and Electric Company

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Kristin Ralff Douglas
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Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company's Topics for Discussion on the Office of Energy Infrastructure Safety's Revised Draft SB 884/EUP Guidelines**

Dear Ms. Douglas:

During today's workshop PG&E raised five topics for discussion that may result in potential changes to the draft guidelines. Per your request we will submit these to the SB884 docket today.

**1. Topic: High Frequency Outage Program Threshold**

Draft Guidelines (Section 2.7.9)

High Frequency Outage Program Threshold is the measure of likelihood above which is considered to have a significantly high likelihood of frequent or prolonged disruption of service to customers. This threshold must measure both likelihood of an Outage Program Event and its anticipated length. This threshold must represent less than 1% of circuit segments in the entire system by mile and no more than 10% of Outage Program Likelihood by score.

Issue

1. The likelihood and duration of an EPSS event and a PSPS event can be very different, and it is difficult to scale the two outage events together. Additionally, choosing a threshold based on both programs will naturally more heavily weight the outcomes towards EPSS due to the widespread nature of the program.

2. The Guidelines are inconsistent in how they define High Frequency Outage Program. Section 2.7.9 defines High Frequency Outage Program Threshold as measuring both the likelihood of an event and its anticipated length. The High Frequency Outage Program Mitigation Standard is defined as the minimum decrease in Outage Program Likelihood but does not refer to anticipated duration. The definition of High Frequency Outage Program excluding anticipated duration of an outage is included in Section 2.7.9.1 and in Appendix A.

## 2. Topic: Project-Level Thresholds and Standards

Draft Guidelines (Section 2.7.9.1)

Ignition Tail Risk Threshold is the measure of consequence above which a circuit segment is considered to have significant potential for catastrophic wildfire, that it merits special consideration. This threshold must represent less than 1% of circuit segments in the entire system by mile and no more than 10% of the wildfire consequence by score.

High Frequency Outage Program Threshold is the measure of likelihood above which is considered to have a significantly high likelihood of frequent or prolonged disruption of service to customers. This threshold must measure both likelihood of an Outage Program Event and its anticipated length. This threshold must represent less than 1% of circuit segments in the entire system by mile and no more than 10% of Outage Program Likelihood by score.

Issue

When an electrical corporation updates its risk models, the ignition tail risk and high frequency outage program thresholds referenced in Section 2.7.9.1 of the Guidelines may change.

The thresholds are: (1) Ignition Tail Risk - 1% of circuit segments in the entire system by mile and no more than 10% of the wildfire consequence by score; and (2) High Frequency Outage Program - 1% of circuit segments by mile and no more than 10% of outage program likelihood by score.

It is unclear if the Guidelines allow an electrical corporation to establish new thresholds when it updates its risk model.

## 3. Topic: Emergent Rebuild Work

Draft Guidelines

The existing EUP guidelines are silent about rebuild-related requirements.

SB 884 section "8388.5 (2) indicates eligibility for "Only undergrounding projects located in tier 2 or 3 high fire-threat districts or rebuild areas may be considered and constructed as part of the program."

Issue

PG&E would like to understand how Energy Safety envisions allowing for fire rebuild to be introduced to the EUP for execution and cost recovery if requested by the Electric Corporation. There are two key issues that emergent rebuild work could have on the program: (1) Unplanned rebuild work may impact the total planned risk reduction established in the base EUP, and (2) Unplanned rebuild work may impact the electric corporations' ability to complete originally planned work due to the shifting resources to complete rebuild work.

**4. Topic: Project Construction Table (C.1.12) – Historical Line Identification**

Draft Guidelines

Table C.1.12, the Project Construction Table, requires an electrical corporation to provide both a historical line identification (historical_line_id) and new line alignment (new_alignment_id) by mapping to geo-spatial submission for every project or subproject with all applied screens.

Issue

PG&E does not maintain historical GIS data that shows where a line was located. When a line is removed and relocated (either underground or overhead) only the new, current location is maintained in our GIS system of record.

As discussed in our Opening Comments, PG&E does not track historical changes or planned undergrounding work in GIS. Any line or circuit segment designations are for internal use only and are not centrally managed or governed in GIS (PG&E's Opening Comments on the Draft Guidelines, pages 19-20).

It would be extremely burdensome to develop a system that would provide both a historical line identification and new line alignment by mapping to geo-spatial submission for every project or subproject with all applied screens.

**5. Topic: New Technology**

Draft Guidelines

New technology is not addressed in the draft guidelines.

Issue

An Electric Corporation may want to introduce new technology as a potential mitigation for consideration in the EUP. The guidelines are silent on how these mitigations would be introduced and considered for inclusion in the plan.

Thank you in advance for considering our comments. Please feel free to contact me if you have questions about these items or need additional information from me at Megan.Ardell@pge.com.

Very truly yours,

*/s/ Megan Ardell*

Megan Ardell