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# Recommendations for scoping of PSPS in RDF Phase Two

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## Agenda:

### PSPS should be scoped in RDF Phase 2 to address the following:

1. PSPS event risk and harms to the public are significant, potentially 2<sup>nd</sup> only to wildfire risk. PSPS event mitigation programs must be expedited.
2. PSPS event risk should therefore be evaluated as an explicit RAMP risk.
3. As with other RAMP risks, such as wildfire risk, utilities should develop PSPS Mitigation Plans to address PSPS event risks.
4. Utility PSPS Mitigation Plans should include a detailed PSPS risk analysis to develop and prioritize mitigation plans.
5. Utility PSPS Mitigation Plans should include a detailed roadmap, context, and timeline of PSPS event risk mitigation projects.
6. Utilities should evaluate and report on PSPS event mitigation program costs, RSEs, and mitigation performance effectiveness.

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## PG&E RAMP Risk Scores

Rank	LOB	Safety Risks	2023 Baseline Score	
			Safety Risk Score	Multi-Attribute Risk Score
1	EO	Wildfire	9,856	25,127
2	SHED	Third Party Safety Incident	887	944
3	GO	Loss of Containment on Gas Transmission Pipeline	128	281
4	SHED	Contractor Safety Incident	94	94
5	SHED	Employee Safety Incident	86	90
6	GO	Loss of Containment on Gas Distribution Main or Service	72	99
7	SS	Real Estate and Facilities Failure	69	97
8	PGEN	Large Uncontrolled Water Release (Dam Failure)	41	70
9	EO	Failure of Electric Distribution Overhead Assets	18	525
10	SHED	Motor Vehicle Safety Incident	16	17
11	EO	Failure of Electric Distribution Network Assets	6	7
12	GO	Large Overpressure Event Downstream of Gas M&C Facility	5	13

PSPS as a RAMP Risk is at least 8515?

## Utilities should evaluate PSPS events as a RAMP risk

In PG&E's initial safety risk scoring in its 2020 RAMP application, PG&E assessed that PSPS reduced its wildfire risk score by 14,560.

The *net* wildfire risk reduction, however, was only 6,046 as PG&E assessed that PSPS **increased** the reliability risk score by 8515.\*

This indicates that had PSPS been evaluated separately as a RAMP risk to the public, it would likely have ranked **2<sup>nd</sup> only to wildfires**.

Note: Treating PSPS as an independent risk would also affect the scoring of wildfire risk, however it would not change this overall ranking of PSPS events as a top RAMP risk that must be mitigated.

Wildfire and PSPS risks dwarf all of PG&E's other top risks.

\*PG&E, *Data Request response* (Nov. 17, 2020), RAMP-2020\_DR\_CalAdvocates\_003-Q01-02.

3. **As with other RAMP risks, such as wildfire risk, utilities should develop PSPS Mitigation Plans to address PSPS event risks.**
4. **Utility PSPS Mitigation Plans should include a detailed PSPS risk analysis to develop and prioritize mitigation plans.**
5. **Utility PSPS Mitigation Plans should include a detailed roadmap, context, and timeline of PSPS event risk mitigation projects.**
6. **Utilities should evaluate and report on PSPS event mitigation program costs, RSEs, and mitigation performance effectiveness.**

Similar to wildfire risk, PSPS event risk is a top risk with significant harms to the public. While PSPS is also a mitigation, PSPS event harms and risks to the public must be explicitly and robustly addressed in the RAMP to prioritize and mitigate this major risk to the public. Risk analysis must explicitly include an analysis of the specific PSPS harms and risks to different geographic locations and types of customers, including different types and classes of vulnerable customers.

Development and prioritization of mitigation programs to reduce PSPS event risk and harms, would benefit from processes similar to that used for development and review of Wildfire Mitigation Plans (WMPs).

The Commission should determine how best practices in the WMP review process, employed by the Office of Energy Infrastructure Safety (OEIS), may be applied in the RAMP to address PSPS event risk.

The RAMP process should include, among other things, a detailed roadmap, context, and timeline of PSPS event risk mitigation programs, PSPS event mitigation program RSEs, and reporting, assessment and improvement of metrics to assess mitigation performance effectiveness.

**Cal Advocates recommends that all of these be addressed in Phase 2 of the RDF.**