



# Incorporating the Risk Analysis Associated With PSPS into the Risk- Based Decision-Making Framework

Risk OIR (R.20-07-013) Technical Working Group

July 16

# Risk OIR – PSPS Modeling Overview

## **Purpose of this Technical Working Group:**

*Administrative Law Judge's Ruling Providing Staff Recommendation for Comment:*

The purpose of this TWG meeting is “...to further scope the issues related to modeling PSPS events in the RDF, and any substantial changes to the adopted RDF approaches to be addressed in Phase II of the RDF proceeding.”

## **Presentation Overview:**



*The IOUs are generally aligned in our positions regarding PSPS treatment in the RDF. However, there may be a few areas where the IOUs' positions may vary as this work effort continues.*

# Initial Considerations

- PSPS Operational Guidelines, Reporting, Procedures and Compliance/Reasonableness are already addressed within the scope of PSPS OIR (*R.18-12-005*) and the Utility *Wildfire Mitigation Plans* (WMPs).
- PSPS Consequences cannot be analyzed in isolation: *Consequences from Wildfire Risk* need to be addressed here as well.
- Are there primary and secondary use cases that will benefit from additional modeling of PSPS consequences? Existing filings should be reviewed to understand where additional modeling might lead to significantly different conclusions.
- Which other proceedings impact, or are impacted by the effort here (*R.18-12-005* / *I.19-11-013* (PSPS OII); WMP Resolutions; Microgrids and Resiliency Strategies, Track 4; Etc.)? Where are there risks of inconsistent or unproductive results?
- Transition Plan: How will potential modeling frameworks here be appropriately adopted into other on-going risk-based proceedings (e.g. WMP, RAMP/GRC, etc.)?
- Improved modeling should be data-driven: models require objective and documentable sources of consequences. The adopted framework should retain the flexibility to incorporate these new data sources in the particular manner that best fits the overall S-MAP implementation and fosters transparent and effective risk-informed decision-making.

# Proposed Scope

Phase II of the Risk OIR should focus on PSPS *risk* from a system-wide perspective and not stray into the *operational* aspects of PSPS events and responses. Operational aspects of PSPS, including the guidelines and requirements governing PSPS, are appropriately within the scope of the PSPS OIR (Rulemaking 18-12-005.)

As part of this process, we would appreciate feedback from stakeholders on quantitative, documented evidence of PSPS safety, financial and reliability impacts beyond those the IOUs already incorporate.

## In-Scope

- Customer and community impacts from PSPS events related to safety, financial and reliability consequences
- Risk Modeling of PSPS to help ensure the appropriate data, assumptions, and methods are used

## Out of Scope

- Operational Aspects of PSPS including:
  - Thresholds for when to de-energize customers
  - Timing and content of customer notifications
  - Reasonableness review of PSPS events
- In-event operational tools.

# Proposed Schedule

This proposal takes the into account the related proceedings and Phase II timeline and the IOUs' proposed in-scope issues.

Item	Description	Schedule
Establish use cases for modeling effort	Clearly articulate how the modeling effort here will be employed and why it is necessary (e.g. calculating RSEs in RAMP/GRC)	Q3 2021
Review of WF/PSPS Modeling in SDG&E RAMP	Identify areas where improvements in PSPS consequence modeling will be useful.	Q4 2021
Review of 2021 reports from I.19-11-013	As IOUs begin quantifying the effects of PSPS events, it will provide insight and data on consequences	Q1 2022
Reliability Attribute Modeling	In-depth consideration of other Reliability data/measures to capture additional PSPS/WF consequences	Q1 2022
Safety Attribute Modeling	In-depth consideration of other Safety data/measures additional PSPS/WF consequences	Q2 2022
Financial Attribute Modeling	In-depth consideration of other Financial data/measures to capture additional PSPS/WF consequences	Q2 2022
Issue Report and Recommendations	Document and summarize findings	Q3 2022