JENNER & BLOCK LLP
Reid J. Schar (*pro hac vice*)
RSchar@jenner.com
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: +1 312 222 9350
Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
kdyer@clarencedyer.com
899 Ellis Street
San Francisco, CA 94109-7807
Telephone: +1 415 749 1800
Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP
Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
825 Eighth Avenue
New York, NY 10019
Telephone: +1 212 474 1000
Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

PG&E'S RESPONSE TO REQUEST FOR 2020 ANALYSIS

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company ("PG&E") respectfully submits this response to the Court's Request for 2020 Analysis in a similar format as the chart PG&E provided the Court on March 29, 2021 for 2019. (Dkt. 1376; *see* Dkt. 1369-1.)

PG&E is producing as Exhibit A a similar chart that includes, for 2020, the estimated impact that PG&E's tree-overstrike and Priority 1 and Priority 2 proposals may have had in expanding the scope of PSPS events under the models PG&E had in place in 2020. (*See* Dkt. 1369 at 2-3.) PG&E reiterates that the figures included in the chart are approximations that are based on several assumptions, but PG&E believes that they are directionally representative of the impact that these differences in PSPS protocols could have had if applied in 2020.[1]

[1] In particular, PG&E notes that the estimated impact if PG&E had considered Priority 1 and Priority 2 trees in 2020 (as estimated in Exhibit A) assumes that in 2020, PG&E would not have mitigated outstanding Priority 1 or Priority 2 trees prior to the de-energization event. As described during the March 23 hearing, when PG&E implements the proposal regarding Priority 1 and Priority 2 trees this year, it intends to mitigate some or all outstanding Priority 1 and Priority 2 trees to help avoid the de-energizations that would be triggered by such trees.

Dated: April 16, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

CLARENCE DYER & COHEN LLP

By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

Attorneys for Defendant PACIFIC GAS AND ELECTRIC COMPANY

EXHIBIT A

Year	Guidance	% Captured of All HFTD Tree Over Strike in Cells > 70th Percentile[1]	% Captured of All HFTD Veg. Outages in Cells > 70th Percentile[1] (2008-2020)	PSPS Total Events[2]	% Difference Total Events from Actual T&D[2]	Total Customer-Hours[3,4,5]	% Difference from Actual T&D - Total Customer-Hours [3,4,5]	Total Customer Impact[3]	% Difference from Actual T&D - Total Customer Impact[3]	Avg. Customer Impact[3]	% Difference from Actual T&D - Avg. Customer Impact [3]	Avg. Event Duration[5]	% Difference from Actual T&D - Avg. Event Duration[5]	Max. Event Customer Impact[3]	% Difference from Actual T&D - Max. Event Customer Impact[3]
2020	**2020 Actual Events (Transmission & Distribution Scope Impacts)**	66%	70%	6	-	22,597,447	-	653,059	-	108,843	-	29	-	345,470	-
2020	**2020 Actual Events (Distribution Only Scope Impacts)**	66%	70%	6	-	21,681,105	-	628,520	-	104,753	-	29	-	345,470	-
2020	**2020 Actual T&D + P1/P2 Trees**	67%	71%	6	0%	22,661,812	0.3%	654,780	0.3%	109,130	0.3%	29	0%	345,470	0%
2020	**2020 Actual T&D +>70th Percentile - Sum Tree Over Strike**	94.2%	89.7%	6	0%	27,376,098	21.1%	727,319	11%	121,220	11%	31	7%	367,830	6%
2020	**2020 Actual T&D +>70th Percentile - Sum Tree Over Strike + P1/P2 Trees**	94.2%	89.8%	6	0%	27,448,924	21.5%	729,270	12%	121,545	12%	31	7%	367,830	6%

1. **% Captured of HFTD Tree Over Strike, Vegetation Caused Outages 2008-2020**, based on cells >70th percentile enhanced 2020 OPW 2.0 based on input sustained wind speed of 20mph matching minimum fire potential conditions, + net new cells >70th percentile tree over strike for the potential overstrike criteria study, + net new cells containing P1/P2 trees based on the trees outstanding for the 9/7/20 event for the P1/P2 criteria study. 2020 criteria studies based on enhanced 2020 OPW Model version. Note: 2021 OPW Model version currently under development ahead of 2021 fire season.
2. The **2020 scenario study** is based on **archived model forecasts** of actual PSPS events plus archived forecasts for additional wind events that did not meet the 2020 PSPS criteria but were studied here as potential net new events under the vegetation PSPS criteria scenarios. Note: PG&E's Meteorology and Fire Science team is processing the climatology for new PSPS models with expected completion in Q3 2021 as part of its development of 2021 PSPS model versions as captured in PG&E's Wildfire Mitigation Plan Commitments.
3. **Customer counts** are distribution service points for criteria studies and are estimated at **circuit level counting all customers with HFTD** secondary transformers on a circuit. These customer counts are added to the actual PSPS event customer impacts for 2020.
4. **Customer-Hours** impacts is based on **event duration** multiplied by the **customer count** for each event and then summed across all events to calculate Total Customer-Hours.
5. **Event duration** for the guidance study rows is the net new event weather duration calculated based on the time delta between the first and last hour of the event that are defined to be exceeding PSPS guidance. Some customers will experience shorter weather event duration than this, and if the line is able to be patrolled and restored quickly (for example with no extensive damage found), may experience total outage duration less than the event weather duration. **Event duration** for the actual 2020 events is calculated based on the Event Duration as measured by Customer Average Interruption Duration Index (CAIDI).