

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023-2025
Data Response

PG&E Data Request No.:	CalAdvocates_040-Q003		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_040-Q003		
Request Date:	April 5, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-04
Date Sent:	April 10, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The following questions relate to your 2025 WMP Update submission.

QUESTION 003

PG&E states on page 23 of its 2025 WMP Update regarding its workplan for covered conductor projects:

PG&E is currently refining our workplans for both overhead hardening and undergrounding projects through the end of the GRC period (2026) to account for the direction provided in D.23-11-069.

With respect to covered conductor projects specifically:

- a. D.23-11-069 sets annual risk reduction targets to be achieved by installing covered conductor. In the 2023-2025 WMP period as a whole, does PG&E currently expect to fall short of, meet, or exceed the risk reduction target established in the GRC proceeding?
- b. According to PG&E's current workplan, what is the amount of risk reduction that PG&E expects to achieve in 2024 due to covered conductor projects?
- c. How does your answer to part (b) compare to the risk reduction target established in D.23- 11-069?
- d. According to PG&E's current workplan, what is the amount of risk reduction that PG&E expects to achieve in 2025 due to covered conductor projects?
- e. How does your answer to part (d) compare to the risk reduction target established in D.23- 11-069?
- f. Does PG&E anticipate completing additional covered conductor mileage in 2023-2026 beyond the GRC-authorized 778 covered conductor miles?
- g. If yes, please state the number of miles and PG&E's intended cost recovery venue for said miles.

ANSWER 003

- a. PG&E intends to meet the cumulative system hardening risk reduction requirement of 18% by 2026 using the risk reduction methodology described in Advice Letter 7150-E-A.

- b. Based on the workplan as of February 22, 2024 and referencing the GRC risk reduction methodology described in Advice Letter 7150-E-A, the 2024 target-informed risk reduction for overhead hardening projects is currently forecasted to be approximately 0.6%.

Using the WMP risk reduction method (risk reduction based on WDRM v3 only), the target-informed anticipated risk reduction for overhead hardening projects currently forecasted for completion in 2024 is approximately 0.1%.

Note: these values only include projects in Maintenance Activity Type (MAT) codes 08W and 3UG.

- c. Annual risk reduction forecasts established in D.23-11-069 are cumulative for the GRC period (2023-2026). Risk reduction forecasts for specific mitigation types were not established. The response to subpart (b) includes the overhead hardening contribution to the GRC System Hardening cumulative risk reduction target noted above and shown in the table below.

System Hardening GRC Risk Reduction Targets (per D.23-11-069, OP 23)

Date	12/31/2023	12/31/2024	12/31/2025	12/31/2026	Overall Target: 2023-2026
Cumulative Risk Reduction Target	2%	5%	10%	18%	18%

For all system hardening work, including overhead covered conductor, underground and line removal, the 2024 cumulative risk reduction target established in D.23-11-069 is 5% for 2023-2024. Based on the system hardening workplan as of February 22, 2024 and using the GRC risk reduction methodology described in Advice Letter 7150-E-A, PG&E's current forecasted cumulative risk reduction for system hardening in 2023-2024 is 4.7% (MAT codes 3UG and 08W only). The actual risk reduction values of completed system hardening work is expected to meet the overall cumulative target of 18% by 2026.

Note, as described in the 2023 WMP ACI 22-16, the workplans purposefully build in additional miles compared to the proposed targets at that time to account for the fact that project dependencies and construction issues may arise and delay some projects. Therefore, the cumulative mileage and risk reduction associated with the workplan are currently overstated as compared to what would be accomplished in accordance with the target. To account for this, the risk reduction reported in this response has been proportionately adjusted to align the anticipated risk reduction with the target miles.

- d. The system hardening workplan associated with years 2025 and 2026 is currently combined, as the projects associated with each year are still being finalized. Based on the workplan as of February 22, 2024 and referencing the GRC risk reduction methodology described in Advice Letter 7150-E-A, the 2025-2026 target-informed risk reduction for overhead hardening projects is currently forecasted to be approximately 5.0%.

Using the WMP risk reduction method (risk reduction based on WDRM v3 only), the target-informed anticipated risk reduction for overhead hardening projects currently forecasted for completion in 2025-2026 is approximately 4.3%.

Note: these values only include projects in MAT codes 08W and 3UG.

- e. As mentioned in subpart (c), risk reduction targets established in D.23-11-069 are cumulative for the GRC period (2023-2026). Risk reduction targets for specific mitigation types were not established. The response to subpart (d) includes the overhead hardening contribution to the GRC System Hardening cumulative risk reduction target noted above and shown in the table below.

System Hardening GRC Risk Reduction Targets (per D.23-11-069, OP 23)

Date	12/31/2023	12/31/2024	12/31/2025	12/31/2026	Overall Target: 2023-2026
Cumulative Risk Reduction Target	2%	5%	10%	18%	18%

For all system hardening work, including overhead covered conductor, underground and line removal, the 2025 cumulative risk reduction target established in D.23-11-069 is 10% for 2023-2025, and 18% for 2023-2026. Based on the system hardening workplan as of February 22, 2024 and using the GRC risk reduction methodology described in Advice Letter 7150-E-A, PG&E's current forecasted cumulative risk reduction for system hardening in 2025-2026 and 2023-2026 is 13.7% and 18.4%, respectively (MAT codes 3UG and 08W only).

Note, as described in the 2023 WMP ACI 22-16, the workplans purposefully build in additional miles compared to the proposed targets at that time to account for the fact that project dependencies and construction issues may arise and delay some projects. Therefore, the cumulative mileage and risk reduction associated with the workplan are currently overstated as compared to what would be accomplished in accordance with the target. To account for this, the risk reduction reported in this response has been proportionately adjusted to align the anticipated risk reduction with the target miles.

- f. Please see the response to CalAdvocates_040_Q002, subpart (f), PG&E has the same position as it relates to Overhead Hardening target miles as articulated in the response to Q2 (f) for undergrounding.
- g. Please see the response to CalAdvocates_040_Q002, subpart (g) PG&E has the same position as it relates to Overhead Hardening target miles as articulated in the response to Q2 (g) for undergrounding.