

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

PG&E Data Request No.:	MGRA_002-Q002		
PG&E File Name:	WMP-Discovery2023_DR_MGRA_002-Q002		
Request Date:	April 20, 2023	Requester DR No.:	MGRA-PGE-WMP23_No.2
Date Sent:	April 25, 2023	Requesting Party:	Mussey Grade Road Alliance
DRU Index #:		Requester:	Joseph Mitchell

**REFCL**

*With regard to PG&E's response to CalPA\_Set WMP-11\_Q14: PG&E states that one of the significant changes to the grid required for REFCL is "The replacement of old, direct bury underground cable":*

**QUESTION 002**

Does PG&E have any recently undergrounded segments that are also "direct bury"?  
If so would these be incompatible with REFCL?

**ANSWER 002**

Direct bury of underground cable, meaning laying the cable directly in a dirt trench and not inside a conduit, is not a standard, approved design for our underground electric distribution system at this point in time. As such, no, we have not recently undergrounded any electric distribution segments via direct bury. The direct bury underground cable design itself would not be incompatible with REFCL, however, many direct bury underground cable installations are old and the cable insulation may not withstand the 1.7 times normal line-to-ground voltages required during REFCL operation.