

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

PG&E Data Request No.:	CalAdvocates_028-Q016		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_028-Q016		
Request Date:	August 10, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-28
Date Sent:	August 15, 2023	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

RN-PG&E-23-05

QUESTION 016

Page 68 of PG&E's response states, "There are 79 circuit segments that are not included in an underground plan and have not been hardened. In place of these circuit segments, PG&E chose to add different circuit segments to the portfolio that could be undergrounded more efficiently. PG&E manages wildfire risk on these 79 circuit segments through our portfolio of Comprehensive Monitoring and Data Collection and Operational Mitigations described above."

- a) Has PG&E considered overhead hardening on the 79 circuit segments described in this section?
- b) If the answer to part (a) is yes, why did PG&E not list overhead hardening as a mitigation for these 79 circuit segments?
- c) If the answer to part (a) is no, explain why not.

ANSWER 016

- a) PG&E has not considered them for overhead system hardening. Since late 2021 PG&E has prioritized undergrounding as the preferred approach to permanently reduce the most system risk.
- b) N/A
- c) PG&E has not ruled out these 79 circuit segments for future undergrounding work after completing projects identified with lower feasibility scores. PG&E also already has overhead hardening projects in scope through the remainder of this WMP period (2023-2025).

As stated in response to Revision Notice 23-05, PG&E is in the process of constructing a benefit/cost model that will incorporate several elements of our mitigation selection decision-making process (e.g., underground and overhead hardening) into an analytical tool called the Wildfire Benefit Cost Analysis (WBCA) tool. We will update our future circuit selections, including these 79 circuit segments with higher feasibility scores, using this WBCA tool as we build out our system hardening plans for the future. Until that time, the 79 circuit segments not currently

selected for targeted undergrounding or overhead hardening and are protected through our portfolio of Comprehensive Monitoring and Data Collection and Operational Monitoring mitigations.