

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

PG&E Data Request No.:	CalAdvocates_045-Q001		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_045-Q001		
Request Date:	April 15, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-09
Date Sent:	April 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The following questions relate to your 2025 WMP Update submission.

QUESTION 001

Regarding its usage of Wildfire Distribution Risk Model (WDRM) v4 in scoping covered conductor and undergrounding projects, and the reflection of such in its System Hardening Accountability Report required by D.23-11-069,¹ PG&E states the following in response to Question 6 of data request CalAdvocates-PGE-2025WMP-04:

The scope of the SHAR [System Hardening Accountability Report] includes System Hardening work completed in the GRC period (2023-2026). Projects in this time period are not currently anticipated to be informed by WDRM v4. In the event projects selected by WDRM v4 do end up being planned for completion during this time period, WDRM v4 information would be included in the SHAR in the existing risk-related fields (i.e., Applicable Risk Model, Risk Reduction %, etc.).

- a) In the event projects selected with WDRM v4 do end up being planned for completion in the GRC period, how will PG&E show that it is meeting the risk reduction targets outlined in D.23-11-069?²
- b) In the event projects selected with WDRM v4 do end up being planned for completion in the GRC period, will PG&E file a Petition for Modification (PFM) of D.23-11-069 to reflect usage of WDRM V4? Please explain your answer.
- c) In the event projects selected with WDRM v4 do end up being planned for completion in the GRC period, will PG&E submit an advice letter to modify the SHAR template to reflect usage of WDRM v4? Please explain your answer.
- d) In the event projects selected with WDRM v4 do end up being planned for completion in the GRC period, will PG&E use different means (other than a PFM of D.23-11-069 or an advice letter) to modify the SHAR reporting requirements or SHAR template contents? Please explain your answer.

¹ D.23-11-069, *Decision on Test Year 2023 General Rate Case of Pacific Gas & Electric Company*, Ordering Paragraphs 20 through 28 at 904-907.

² PG&E is required to reduce risk on its system from the 2023 baseline risk amount by 2% by 12/31/2, 5% by 12/31/24, 10% by 12/31/25, and at least a total of 18% by 12/31/2026. See D.23-11-069, *Decision on Test Year 2023 General Rate Case of Pacific Gas & Electric Company*, Ordering Paragraph 23 at 905.

ANSWER 001

- a) PG&E does not anticipate completing any projects selected with WDRM V4 in the 2023 GRC period. As noted in response to question CalAdvocates 040-Q006, WDRM v4 may begin to inform scoping of undergrounding projects as early as the second half of 2024 for undergrounding projects planned for completion in 2027 and beyond. It is possible, but unlikely, that some of these projects may be completed prior to 2027.

Were this to take place, we would follow the logic and methodology described in Advice Letter 7150-E-A. Specifically, where the excel templates for the baseline sheet for forecasted risk reduction (Table 1) and the completed sheet for completed project risk reduction (Table 2) currently include rows for WDRM 2 and WDRM 3 and their summed totals, we would add a new row for WDRM 4 and include those values in the summed totals.

- b) If PG&E were to complete in the 2023 GRC period any projects selected with WDRM V4, we would not file a PFM of D.23-11-069 because no modification of the decision would be necessary. As written, the decision recognizes the evolving nature of risk models and explicitly allows for the use of “any other future version” of WDRM beyond V2 and V3.³
- c) In the unlikely event PG&E selects projects with WDRM V4 for completion in the 2023 GRC period, WDRM v4 information would be included in the SHAR in the existing risk-related fields (i.e., Applicable Risk Model, Risk Reduction %, etc.). If there are other additional substantial changes needed to the template, PG&E would work with SPD staff who, per D.23-11-069, have ministerial authority to adjust the requirements for the SHAR report.⁴
- d) Yes. Please see response to sub-part c above.

³ D. 23-11-069, Ordering Paragraph (OP) 24.

⁴ D. 23-11-069, OP 25.