

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigation Plans Discovery 2022  
Data Response**

PG&E Data Request No.:	CalAdvocates_013-Q06		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_013-Q06		
Request Date:	March 4, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-13
Date Sent:	March 9, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Miles Gordon

The following questions relate to your 2022 WMP Update submission.

**Note: if the report requested in question 1(a) contains a full response to any of the other questions or sub-parts, your responses thereto may consist of a citation to specific pages of the report.**

**QUESTION 06**

- a) How effective is REFCL compared to covered conductor installation in reducing wildfire risks?
- b) Please provide any available supporting documentation regarding your response to subpart (a) above.
- c) How effective is REFCL compared to undergrounding in reducing wildfire risks?
- d) Please provide any available supporting documentation regarding your response to subpart (c) above.

**ANSWER 06**

- a) If successfully operationalized, REFCL is effective for mitigating line to ground faults; whereas covered conductor is effective for mitigating line to ground faults and phase-to-phase faults, such as conductor slapping together as a result of high gusting winds, or broken tree branches that make contact across phases but do not contact the ground.
- b) Please refer to the report at page(s) 2, 3, 4 in Attachment "WMP-Discovery2022\_DR\_CalAdvocates\_013-Q01A1ch01.pdf" provided in response to Question 1(a). Please also see 2022 WMP, Sections 7.3.3.3, 7.3.3.4, and 7.3.3.17.1 and the response to Remedy 21-09 in Section 4.6 for discussions regarding covered conductor.
- c) Please refer to PG&E's responses to Questions 6 (a) and (b) for information regarding REFCL. Underground cables are highly effective for mitigating ignition risks because they are insulated and installed below the ground, and therefore are immune from external weather-related conditions that may damage an overhead distribution line, such as high winds or downed vegetation.
- d) Please see the 2022 WMP, Sections 7.3.3.16 and 7.3.3.17.1 for discussions regarding PG&E's undergrounding work.