

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

PG&E Data Request No.:	SPD_005-Q003		
PG&E File Name:	WMP-Discovery2023_DR_SPD_005-Q003		
Request Date:	May 16, 2023	Requester DR No.:	SPD_PG&E_2023_005
Date Sent:	June 12, 2023	Requesting Party:	Safety Policy Division
DRU Index #:		Requester:	Kevin Miller

**SUBJECT: DATA REQUEST SPD\_PG&E\_2023\_005; DUE MONDAY, JUNE 12, 2023;  
SUBJECT: UNDERGROUNDING PROJECT COSTS AND NON-CPUC-REPORTABLE  
IGNITION DATA**

**QUESTION 003**

How is PG&E incorporating subsurface variability (e.g., encountering hard rock, slope, or other conditions presenting significant, physical obstacles) into undergrounding cost calculations? Provide an example.

**ANSWER 003**

PG&E recognizes that subsurface variability contributes to undergrounding cost, but does not incorporate a specific subsurface variability factor into its portfolio cost forecasts.

For completed work, costs associated with subsurface variability are captured at the individual project level, which is incorporated into the average cost per mile of the portfolio. PG&E describes construction issues related to subsurface variability and how those issues can impact projects costs in PG&E Wildfire Mitigation Plan - WMP-Discovery2023\_DR\_CalAdvocates\_022-Q002.