

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigations Plans Discovery 2026-2028  
Data Response**

<b>PG&amp;E Data Request No.:</b>	OEIS_002-Q003
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_OEIS_002-Q003
<b>Request Date:</b>	April 11, 2025
<b>Requester DR No.:</b>	OEIS-P-WMP_2025-PG&E-002
<b>Requesting Party:</b>	Office of Energy Infrastructure Safety
<b>Requester:</b>	Nathan Poon
<b>Date Sent:</b>	April 16, 2025

**SUBJECT: REGARDING PG&E’S Q4 QUARTERLY DATA REPORT FOR 2022, 2023, AND 2024**

**QUESTION 003**

PG&E’s 2026-2028 Base WMP defines “Fire Rebuild” work as undergrounding installations in areas impacted by wildfires within High Fire Threat District (HFTD); and defines “Community Rebuild” work as undergrounding installations in areas impacted by wildfires outside of the HFTD. Additionally, PG&E states that its undergrounding work includes activities under System Hardening, Butte County Rebuild, Community Rebuild programs, and other efforts in HFTD, High Fire Risk Area (HFRA), buffer zones, and fire rebuild areas.

- a. For 2024: PG&E reported 348.3 circuit miles total completed under 10K Undergrounding (GH-04). Provide a breakdown of the total miles completed in 2024 by the following categories:
  - i. Undergrounding as part of System Hardening (GH-01) activity.
  - ii. Undergrounding as part of its Fire Rebuild program.
  - iii. Undergrounding as part of its Community Rebuild program
  - iv. Any other undergrounding work performed in HFTD, HFRA and Buffer Zone
    - A. For each other type of undergrounding work specified here, explain why this work was not reported under the System Hardening (GH-01) activity.
- b. For 2023: PG&E reported 363.9 circuit miles total completed under 10K Undergrounding (GH-04). Provide a breakdown of the total miles completed in 2023 by the following categories:
  - i. Undergrounding completed as part of System Hardening (GH-01);
  - ii. Undergrounding completed as part of the Fire Rebuild program;
  - iii. Undergrounding completed as part of the Community Rebuild program;
  - iv. Any other undergrounding completed in HFTDs, HFRAs, or buffer zones.

- A. For each other type of undergrounding work specified here, explain why this work was not reported under the System Hardening (GH-01) activity.

### Answer 003

Please see the table below for the requested information in subparts a. and b. The data provided is updated as of January 14, 2025, in alignment with the Q4 2024 WMP Quarterly Data Report (QDR).

Note, the data provided is slightly adjusted from the values reported in the Q4 2023 QDR due to the completion of project as-built construction packages.

For clarity, in 2024, PG&E completed 257.8 miles under WMP initiative GH-04, not 348.3 miles referenced in the question, which are the miles completed in WMP initiative GH-01, instead. Based on the detail included in the question, we assume the intention was to include the total completed GH-04 mileage and associated sub-programs, which is reflected in our response.

Year	i. Undergrounding as part of System Hardening activity <sup>1</sup>	ii. Undergrounding as part of the Fire Rebuild program <sup>2</sup>	iii. Undergrounding as part of the Community Rebuild program <sup>3</sup>	iv. Any other undergrounding work performed in HFTD, HFRA and Buffer Zone <sup>4</sup>	Total (i+iii+iv)
a. 2024	213.8	27.5	42.0	2.0	257.8
b. 2023	284.4	57.6	75.7	4.1	364.2

<sup>1</sup> System Hardening Undergrounding miles are included in both 2023 Base WMP Initiatives: GH-01 System Hardening and GH-04 Undergrounding.

<sup>2</sup> Fire Rebuild Undergrounding miles are included in the GH-01 System Hardening activity and these miles are included for reference, not in addition to the miles under sub-part i. These miles are also included in GH-04.

<sup>3</sup> The Community Rebuild Program includes Butte and other Community Rebuild. These Undergrounding miles are only included in GH-04, and not in GH-01.

<sup>4</sup> Undergrounding work in this Other category includes projects that were initiated under other programs outside of the System Hardening program which is funded by MAT codes 08W and 3UG, such as Work Requested by Others (WRO), capacity, and Rule 20 B and C programs. These Undergrounding miles are included in both GH-01 and GH-04.

In the table below, PG&E reiterates the sub-program activities that contribute to the GH-01 and GH-04 Initiatives in the 2023 WMP, as well as the updated 2026 WMP Initiative GH-12. In the 2023 WMP, the System Hardening Undergrounding is included in both GH-04 and GH-01 initiatives.

In the 2026-2028 Base WMP, the GH-01 initiative was retired due to the overlap with GH-04. The covered conductor target is now GH-12 and no longer includes undergrounding. GH-12 includes work associated with overhead distribution hardening (covered conductor installation) and line removal with remote grid for base system hardening work, fire rebuild work, and other work in the HFTD. GH-04 will continue as is from the 2023 WMP to the 2026 WMP.

<b>Program</b>	<b>Mitigation</b>	<b>GH-01 (retired after 2025)</b>	<b>GH-04</b>	<b>GH-12 (starting in 2026)</b>
<b>Base System Hardening</b>	UG Miles	Y	Y	N
	OH Miles	Y	N	Y
	Removal Miles	Y	N	Y
<b>Fire Rebuild System Hardening</b>	UG miles	Y	Y	N
	OH miles	Y	N	Y
	Removal miles	Y	N	Y
<b>Butte Community Rebuild</b>	UG Miles	N	Y	N
<b>Other</b>	UG Miles	Y	Y	N
	OH Miles	Y	N	Y
	Removal Miles	Y	N	Y