

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

PG&E Data Request No.:	OEIS_008-Q002Supp01
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_008-Q002Supp01
Request Date:	May 2, 2025
Requester DR No.:	OEIS-P-WMP _2025-PG&E-008
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	May 7, 2025 Supp01: May 16, 2025

**SUBJECT: REGARDING PG&E'S RESPONSE TO OEIS-P-WMP-2025_PG&E-004
QUESTION 04**

QUESTION 002

- a. In part (c) of PG&E's response to data request OEIS-P-WMP_2025-PG&E-004 question 04, PG&E identifies four circuit protection zones as being "privately owned lines."
 - i. PG&E states within this data request response that two of the lines were identified as not being privately owned through the validation process. Given this change, describe how PG&E intend to adjust its current hardening plan in order to reduce risk along these lines.
 - ii. Provide a list of who owns each of these lines.
 - iii. If the lines are owned by someone other than PG&E, why is PG&E including the lines as part of their highest risk circuit segments?
 - iv. Provide a description of PG&E's procedures for working with line owners to decrease risk along their lines.
- b. In part (c) of PG&E's response to data request OEIS-P-WMP_2025-PG&E-004 question 04, PG&E identifies many of the circuit segments to not be included based on not being a "part of selection criteria" as work is "based on density of risk per mile" and "not total risk on the circuit segment."
 - i. Provide an updated version of Table 6-4 based on risk density opposed to total risk score. This must also include the total mileage for each circuit segment, and mileage.

ANSWER 002 SUPPLEMENTAL 01

- b.
 - i. In this context, PG&E understands "risk density" to mean risk per Primary Overhead Mile. Table 6-4 consists of the circuit segments that make up the top 20% of overall utility risk. The table is not re-ranked based on the "risk density". Additionally, we have only included the total mileage of the circuit segment in

the tables as we interpret “total mileage for each circuit segment, and mileage” to be identical. Please see attachment “*WMP-Discovery2026-2028_DR_OEIS_008-Q002Supp01Atch01.xlsx*”.

ANSWER 002

a.

- i. At the time of PG&E’s WMP submission, the 2027 and 2028 work plan had not yet been fully scoped. For purposes of estimating risk reduction associated with PG&E’s GH-04 WMP initiative mileage target, PG&E identified a list of circuit segments that would be considered for scoping. The workplan is dynamic and will continue to evolve as circuit segments, including work on BIG BEND 1101CB and MIDDLETOWN 1101644756, are considered for scoping in accordance with the System Hardening Project Scoping Decisions Trees provided in the WMP Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3.
- ii. Please see attachment “*WMP-Discovery2026-2028_DR_OEIS_008-Q002Atch01CONF.xlsx*” for owners of the two privately-owned lines.
- iii. PG&E’s risk model reflects all lines mapped in the PG&E service area, not just those that are PG&E-owned. Ultimately, the privately owned lines get filtered out during the mitigation selection process when the ownership of the line is confirmed.
- iv. PG&E sends annual notices to private line owners, informing them of their maintenance responsibilities. See attachment “*WMP-Discovery2026-2028_DR_OEIS_008-Q002Atch02CONF.pdf*”, which is an example of the letter sent by PG&E. While inspecting PG&E-owned transformers on private lines, PG&E personnel will send third-party notifications to line owners for infractions observed on their facilities. The Privately-Owned Lines group within PG&E’s Asset Strategy team will communicate with owners to ensure repairs are made in a timeframe commensurate with the infraction and fire threat risk designation of the location. We do not recommend any hardening standards.

Pursuant to agreement with OEIS, PG&E will supplement this response to provide part (b) by Friday, May 16.