

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

PG&E Data Request No.:	TURN_003-Q001
PG&E File Name:	WMP-Discovery2026-2028_DR_TURN_003-Q001
Request Date:	April 17, 2025
Requester DR No.:	TURN-PG&E-3
Requesting Party:	The Utility Reform Network
Requester:	A Mireille Fall-Fry
Date Sent:	April 29, 2025

SUBJECT: 2026-2028 BASE WMP

QUESTION 001

Please provide PG&E's wildfire risk model (WDRM v4) assumptions and results in Excel. Please provide all outputs and assumptions available. At minimum, this should include Circuit Protection Zone (CPZ) name, likelihood, consequence, total risk score, and number of overhead miles of each CPZ in separate columns. In addition, please include the following:

- a. Indicate which CPZs are prioritized for undergrounding from 2026-2028 (please indicate the year work will start and finish).
- b. Indicate which CPZs are prioritized for overhead hardening from 2026-2028 (please indicate the year work will start and finish).
- c. For each CPZ prioritized for undergrounding or overhead hardening from 2026-2028, please provide the CBR for both overhead hardening and undergrounding, regardless of which mitigation was selected.
 - i. Please provide all calculations and assumptions for the CBRs in Excel.
 - ii. Please explain whether project-specific unit costs are used for this calculation.
 - iii. Please explain whether project-specific mitigation effectiveness is used for this calculation.

ANSWER 001

Please see attachment "*WMP-Discovery2026-2028_DR_TURN_003-Q001Atch01.xlsx*," which is PG&E's wildfire risk model (WDRM v4) output. Please refer to sections 3, 4, and 5 in the Wildfire Distribution Risk Model v4 documentation for the requested assumptions, available at https://www.pge.com/en/outages-and-safety/safety/community-wildfire-safety-program.html?WT.mc_id=Vanity_wildfiremitigationplan#accordion-99016a73ab-item-4366b98ea7.

- a. Please see attachment "*WMP-Discovery2026-2028_DR_TURN_003-Q001Atch02CONF.xlsx*," which is the 2026-2028 workplan for GH-04

Undergrounding, which includes system hardening undergrounding and community rebuild work.

A few notes about the data provided:

- The projects planned to be completed in 2026 have been scoped and are broken out into subprojects (i.e. jobs by order).
- The projects planned to be completed in 2027 and 2028 have been identified starting with the highest ignition risk ranked circuit segments that have not yet been scoped and divided into subprojects.
- Project plans for 2027 and 2028 are subject to change once scoping takes place.
- For the year that the work will start and end, we have indicated the construction start year, recognizing planning and scoping takes place in advance of construction start.
- If a subproject is included but 0.0 miles are captured in the workplan, this is due to rounding.
- For the risk score, we have replaced the previously provided mean risk score with the estimated wildfire risk reduction. Mean risk was a data point at the circuit segment level, and estimated wildfire risk provides the total estimated risk reduction for each subproject including all mitigation types across all years on the subproject.
- While PG&E is providing the estimated v4 risk score, this data is based on the assumption that circuit segment names and configurations stay consistent from one model to the next, which is not always the case. Circuit segment names and configurations can change over time.
- Approximately six miles are listed as TBD and represent miles from 2025 that we expect to be carried over into the 2026 workplan, pending construction schedules in the final months of the year.

- b. Please see attachment “*WMP-Discovery2026-2028_DR_TURN_003-Q001Atch03CONF.xlsx*,” which is the 2026-2028 workplan for GH-12 Covered Conductor, which includes overhead hardening and line removal work.

A few notes about the data provided:

- The projects planned to be completed in 2026 have been scoped and are broken into subprojects (i.e. jobs by order).
- The projects planned to be completed in 2027 and 2028 have been identified starting with the highest ignition risk ranked circuit segments that have not yet been scoped and divided into subprojects. Some fields for these projects include “N/A” in a given cell if that information is not available yet.
- Project plans for 2027 and 2028 are subject to change once scoping takes place.
- For the year that the work will start and end, we have indicated the construction start year, recognizing planning and scoping takes place in advance of construction start.

- For the risk score, we have replaced the previously provided mean risk score with the estimated wildfire risk reduction. Mean risk was a data point at the circuit segment level, and estimated wildfire risk provides the total estimated risk reduction for each subproject including all mitigation types across all years on the subproject.
 - While PG&E is providing the estimated v4 risk score, this data is based on the assumption that circuit segment names and configurations stay consistent from one model to the next, which is not always the case. Circuit segment names and configurations can change over time.
- c. CBRs are not available for circuit segments prioritized for undergrounding or overhead hardening from 2026-2028. PG&E did not calculate CBRs for projects planned to be completed in 2026 in alignment with the Risk-Based Decision-Making Framework Phase 2 Decision that did not require project-level CBR calculations.¹

PG&E will use elements of the WBCA to perform a cost-benefit analysis during scoping for 2027 and 2028, however that analysis had not been initiated at the time of our 2026-2028 WMP submission. Preliminary CBRs have been estimated, as seen in previous DR response (OEIS-P-WMP_2025-PG&E-003, Q03f) which included some of the analysis conducted to-date.

The CBR data presented in PG&E's 2026-2028 WMP are presented at the programmatic level. Those CBR calculations are consistent with those that will be proposed in the GRC and are generated using the Enterprise Risk Models. Additionally, these cost-benefit-ratios account for the entire benefit life of the projects and present value of revenue requirements (PVRr). For more detail, please see section 6.2.1.2 Cost Benefit Scores of PG&E WMP Plan R0 2026-2028.

- i. Not applicable.
- ii. Not applicable.
- iii. Not applicable.

¹ D.22-12-017