

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

<b>PG&amp;E Data Request No.:</b>	SPD_003-Q006
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_003-Q006
<b>Request Date:</b>	April 24, 2025
<b>Requester DR No.:</b>	SPD-PGE-WMP2026- 003
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Henry Sweat
<b>Date Sent:</b>	April 29, 2025

**SUBJECT: DATA REQUESTS RELATED TO THE 2026-2028 WMP (SPD-PGE-WMP2026-003)**

**QUESTION 006**

For GH-04, provide a definition of the miles target and compare the definition to the target in the 2026-2028 WMP. For instance, is the target some combination of: “the miles of primary overhead line to be replaced by undergrounding,” “the miles of overhead (primary, secondary and service) line to be replaced by undergrounding,” “the miles of undergrounded primary lines to be installed” or “the miles of undergrounded (primary, secondary and service) lines to be installed.”

- a. PG&E proposes two forms of undergrounding (underground primary, and underground all). Provide the number of miles for each undergrounding type planned for 2026, 2027, and 2028.
- b. Page 181 of the PGE’s 2026-2028 WMP states: “While PG&E will choose either overhead hardening or undergrounding as the primary mitigation, PG&E often implements a hybrid mitigation solution that consists of both overhead hardening and undergrounding on portions of the same circuit segment.”
  - i. If a hybrid solution is implemented, how will the mileage be recorded in GH-04 and GH-12?
  - ii. If undergrounding is the primary mitigation, but some covered conductor is installed on the project because undergrounding is infeasible for a small section of the line – how will the mileage be recorded in GH-04 and GH-12?
  - iii. Provide the number of miles where PG&E expects a hybrid solution will be implemented and recorded in GH-04 and/or GH-12.

**ANSWER 006**

- a. While PG&E’s WMP references the effectiveness of Underground All (primary, secondary and service lines) and of Underground Primary, the undergrounding mileage commitments for GH-04 listed in table 8.1.1 for this WMP period are specifically for the undergrounding of primary distribution lines.

b.

- i. For any project with a combination of undergrounding and overhead hardening and/or line removal, undergrounding mileage will be recorded in GH-04 and overhead hardening and line removal mileage will be recorded in GH-12.
- ii. For any project with a combination of undergrounding and overhead hardening and/or line removal, undergrounding mileage will be recorded in GH-04 and overhead hardening and line removal mileage will be recorded in GH-12.
- iii. Please reference “*WMP-Discovery2026-2028\_DR\_SPD\_003-Q006Atch01.xlsx*” for a list of all circuit segments that have been identified for undergrounding and overhead hardening and/or line removal. For 2026 work, subprojects have been scoped and the miles associated the multiple mitigation types have been included at the subproject-level. For 2027 and 2028 work, the miles associated with hybrid solutions will be determined once they are fully scoped.

A summary of the miles is included in the “Summary” tab and below for reference.

	Recorded in GH-04	Recorded in GH-12	
Year	Undergrounding Miles	Overhead Hardening Miles	Line Removal Miles
2026	83.6	74.4	3.2
2027	TBD	TBD	TBD
2028	TBD	TBD	TBD