

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

<b>PG&amp;E Data Request No.:</b>	SPD_003-Q008
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_003-Q008
<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 008**

Provide additional explanation on the discussion in section 8.2.2 under the heading, “Impacts on Likelihood and Consequence of Program Events.” The questions below are posed under the assumption that the lines would not be subject to PSPS/EPSS conditions due to overhead lines upstream or downstream.

- a. For circuit segments where there are covered conductor miles interspersed among undergrounded miles, explain how PG&E will plan to use PSPS and EPSS for these circuit segments.
  - i. Is there a threshold for the amount of covered conductor? (i.e., if there is a 5-mile undergrounded circuit segment that has only 100 feet of covered conductor and that circuit segment is subjected to PSPS conditions, would a PSPS event be triggered?)
- b. For undergrounded segments from the 2023-2025 WMP where only the primary conductor was undergrounded, explain how PG&E will use of PSPS and EPSS.

**ANSWER 008**

Regarding PSPS, see “Impacts on Likelihood and Consequence of Program Events” in section 8.2.1 of the 2026-2028 WMP which further explains overhead and underground inclusion for PSPS events at a high level. There is no threshold for the amount of covered conductor to be exempt from PSPS.

In the event primary conductor segments have been undergrounded, replacing all overhead primary exposure in High Fire Risk Areas (HFRA) and EPSS buffer areas, a circuit may be removed from EPSS program scope. If only a portion of a circuit is undergrounded, the portions of the overhead primary remaining in HFRA or EPSS buffer areas will continue to be protected by EPSS capable devices when criteria are met.