

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

PG&E Data Request No.:	SPD_003-Q009
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_003-Q009
Request Date:	April 24, 2025
Requester DR No.:	SPD-PGE-WMP2026- 003
Requesting Party:	Safety Policy Division
Requester:	Henry Sweat
Date Sent:	April 29, 2025

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

QUESTION 009

The system target for GH-04 is 370 miles for 2026 whereas PG&E previously forecasted a target of 440 miles.

- a. Provide the breakdown for miles related to Butte County Rebuild in 2026.
- b. The WMP states the reduction is because the PG&E forecasts being able to achieve the risk reduction in the GRC with less miles than previously forecasted. Provide a high-level justification for this number. The justification should be desegregated by the amount of risk reduced per year by mitigation and by the risk model.
- c. Provide the risk reduced in part (b) but calculate the risk reduced based on the risk calculated in WDRM v4.
- d. In Advice Letter 7312-E submitted on July 1, 2024, PG&E presented its System Hardening Accountability Report. In the Baseline_Risk_Miles spreadsheet of Attachment B, PG&E forecasted 53.5 WDRM v2 miles and 575.1 WDRM v3 miles of hardening to be completed in 2026. Do these numbers account for the changed forecast in GH-04?
 - i. If so, please provide how many WDRM v2 miles of undergrounding and how many WDRM v3 miles of undergrounding PG&E now forecasts as being completed in 2026 in order to satisfy the risk reduction target adopted in OP 22 of D.23-11-069.
 - ii. If not, provide the new forecast of WDRM v2 miles and WDRM v3 miles of hardening to be completed in 2026. Also provide how much of the updated forecast of WDRM v2 miles and WDRM v3 miles of hardening that PG&E forecasts would be undergrounding to be completed in 2026.

ANSWER 009

- a. As described in response to WMP-Discovery2026-2028_DR_OEIS_001-Q019, the GH-04 Undergrounding target of 370 reflects PG&E's forecast to complete approximately 10 miles of undergrounding as part of the Butte Community Rebuild effort in 2026.
- b. PG&E reduced the planned GH-04 mileage for 2026 based on the risk reduction achieved in 2023-2024 and forecasted for completion in 2025 in order to stay in compliance with the 2023 GRC risk reduction requirements. Please see Table 1 below with the 2023-2026 risk reduction achieved and forecasted (as of February 24, 2025) in accordance with PG&E Advice 7130 E-A, approved by the CPUC on May 30, 2024. Table 2 shows that the miles planned each year by mitigation type, which exceeds the four-year (2023-2026) 18% cumulative risk reduction target of the 2023 GRC.

Note, the risk and miles included in the tables below exclude Community Rebuild work given it is not part of the 2023-2026 GRC System Hardening program.

Table 1. 2023 – 2026 Completed and Forecasted Risk Reduction

Risk Model Vintage	Mitigation Type	2023		2024	2025	2026	Total
WDRM V2	UG	1.6%		1.3%	0.2%	0.1%	3.2%
	OH	1.2%		1.1%	0.9%	0.2%	3.4%
	LR	0.04%	0.06%	0.05%	0.03%	0.2%	
WDRM V3	UG	0.1%		0.8%	3.5%	3.8%	8.3%
	OH	0.0%		0.1%	1.2%	3.2%	4.5%
	LR	0.0%	0.0%	0.0%	0.03%	0.03%	
Total	UG	1.7%	2.1%	3.8%	3.9%	11.5%	
	OH	1.2%	1.2%	2.1%	3.4%	7.9%	
	LR	0.04%	0.1%	0.1%	0.1%	0.2%	
	TOTAL	3.0%	3.3%	6.0%	7.4%	19.6%	

Table 2. 2023 – 2026 Completed and Forecasted Miles

Risk Model Vintage	Mitigation Type	2023	2024	2025	2026	Total
WDRM V2	UG	257.4	153.3	28.6	23.7	463.0
	OH	132.0	85.2	94.4	23.6	338.5
	LR	5.0	6.6	8.8	9.1	29.6
WDRM V3	UG	27.2	60.5	280.0	336.3	704.0
	OH	0.9	20.4	103.2	270.0	394.5
	LR	0.1	0.0	0.2	14.9	15.2
Total	UG	284.7	213.8	308.6	360.0	1,167.0
	OH	132.9	105.6	201.0	293.6	733.0
	LR	5.1	6.6	9.0	24.0	44.8
	Total	422.7	326.0	518.6	677.5	1,944.8

- c. The estimated WDRM v4 risk values provided in this response represent the risk metrics for circuit segments sharing the same name as the legacy circuit segments on which each project was planned. The risk values from WDRM v4 may be different than risk values from legacy models. Actual circuit segmentation varies over time and there is no guarantee that a project originally targeted on a circuit segment will still lie within the bounds of that same circuit segment's namesake in the updated risk model. It is also possible the name of the circuit segment stays the same, even though the parameters of the circuit segment changes (e.g. segment splits into two upon installation of new protective devices, replacement of a protective device changes the name of the segment, customer load transfers take place). In some cases, the circuit segment's namesake may be entirely absent from the updated risk model.

Acknowledging the aforementioned limitations of this analysis, please see a summary of estimated risk reduced by year and by mitigation type in the Table 3 below:

Table 3. 2023–2026 Completed and Forecasted Risk Reduction Based on WDRM v4

Risk Model Vintage	Mitigation Type	2023	2024	2025	2026	Total
WDRM V4	UG	0.7%	1.7%	2.9%	1.9%	7.2%
	OH	0.4%	0.3%	0.9%	1.6%	3.3%
	LR	0.04%	0.1%	0.1%	0.1%	0.3%
Total		1.1%	2.1%	3.9%	3.7%	10.8%

- d. The GRC Advice Letter 7312-E (SHAR) did not consider PG&E's 2026 undergrounding WMP mileage forecast being reduced from 440 miles to 370 miles in one year. PG&E is managing the System Hardening work portfolio to meet the annual cumulative risk reduction targets as required by the 2023 GRC: 2% by 12/31/2023, by a total of 5% by 12/31/2024, by a total of 10% by 12/31/2025, and by at least a total of 18% by 12/31/2026 of the 2023 baseline risk amount (OP 23). While PG&E does manage to the WMP mileage targets, the 2026 miles included in the 2023 WMP was an estimate, and not a target (2023 WMP, R8, Table 8.1.2-2, pg. 408). The 2023 WMP requires annual targets for 2023-2025.

For clarity, the 2026 miles referenced in the question (53.5 WDRM v2 miles and 575.1 WDRM v3) include three system hardening mitigations: overhead hardening, undergrounding and line removal.¹ In the SHAR, the 2025 forecasted undergrounding work (438 miles) exceeded the WMP target for 2025 (310 miles, excluding Butte Community rebuild forecasts) because the 2025 work was oversubscribed in the SHAR and PG&E anticipated a portion of the portfolio to shift to 2026 or later in order to achieve the risk reduction targets.

- i. Not applicable.

¹ Undergrounding was approximately 305 miles of the 628 miles forecasted in 2026.

- ii. Please see Table 2 above for the requested information. Please note that an additional estimated 6 miles in 2026 are reserved for potential dependencies or carryover from 2025 and are not designated as v2 or v3 applicable in this response as those specific projects cannot be specified in advance. The 10 Butte County Rebuild miles, which apply toward PG&E's GH-04 target, but not the GRC/SHAR, were not selected based on a risk model and are also excluded from the v2/v3 totals in this response.