

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

PG&E Data Request No.:	SPD_004-Q002Supp01
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_004-Q002Supp01
Request Date:	May 1, 2025
Requester DR No.:	CONF-SPD-PGE-WMP2026-004
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 30, 2025 Supp01: June 13, 2025

SUBJECT: MITIGATION COST EFFICIENCY ASSESSMENT (SPD-PGE-WMP2026-004)

QUESTION 002

In an Administrative Law Judge Ruling dated April 22, 2025 in the PG&E 2024 RAMP Proceeding (A.24-05-008), PG&E was directed to conduct a parallel risk evaluation using a risk-neutral, linear scaling function in preparation for PG&E's 2027 GRC Rate Case. For each of the locations listed in 1a.-1c. provide a new calculation without applying PG&E's risk scaling function.

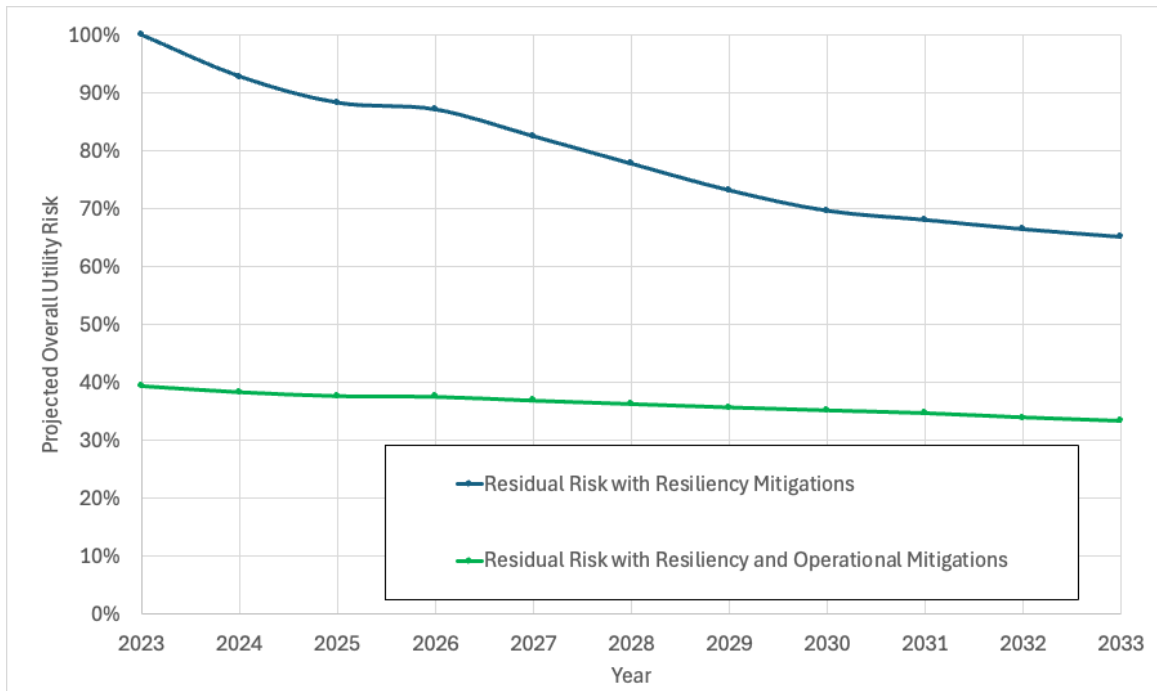
- a. If the values are in a figure, recreate the figure without the scaling function applied to the calculation that generated the value(s) in the figure.
- b. If the values are in a table, recreate the table without the scaling function applied to the calculation that generated the value(s) in the table.
- c. If the values are in the text of the 2026-2028 Base WMP, provide the sentence with the new value that was generated without the scaling function being applied to the calculation.

ANSWER 002 SUPPLEMENTAL 01

Please see below for risk-neutral versions of the figures, tables, and text values identified in PG&E's response to Question No. 1, below.

- a. The following figures are regenerated without a risk scaling function on the April 2025 vintage models¹ for the 2026 Baseline:
 - Figure 6-1 Projected Overall Service Territory Risk

¹ April 2025 vintage models are the models that were used in the 2027 GRC Application.



b. The following tables are regenerated without a risk scaling function:

- Table 6-4 Summary of Risk Reduction for Top Risk Circuits: Please see attachment “WMP-Discovery2026-2028_DR_SPD_004-Q002Supp01Atch01.pdf.”

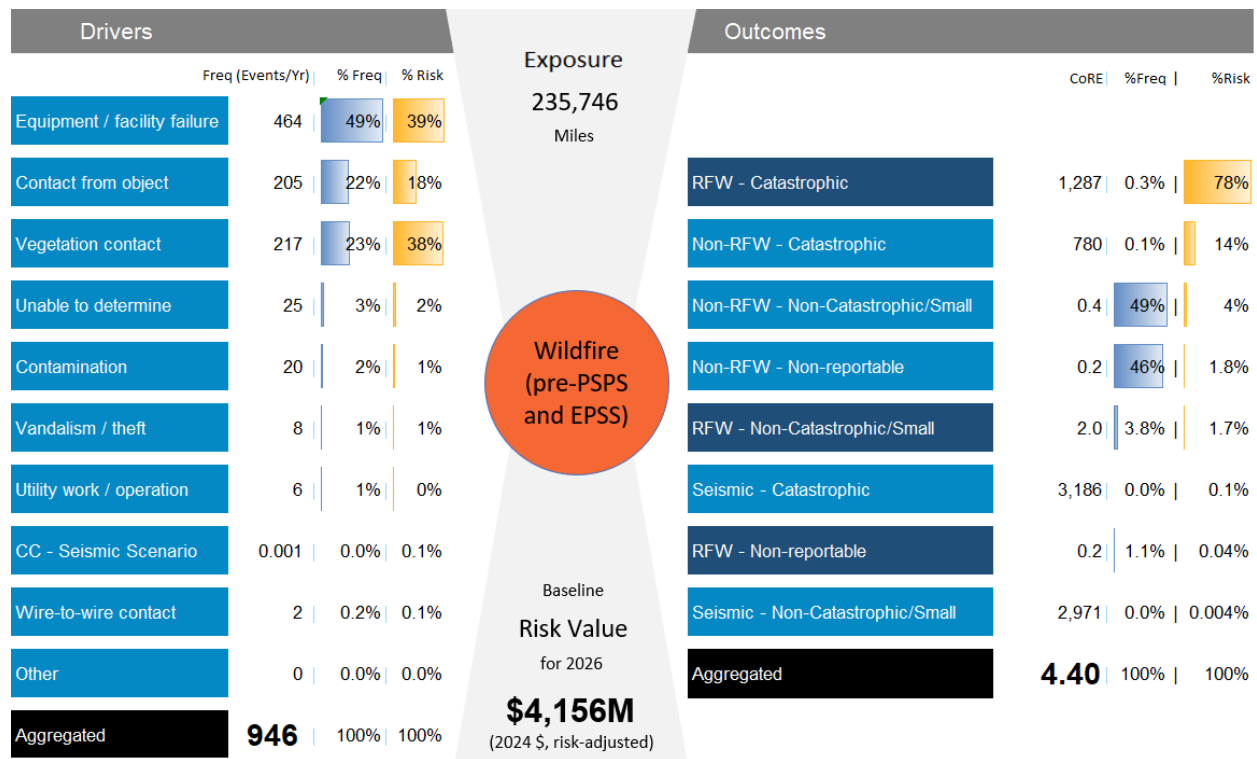
ANSWER 002

Please see below for risk-neutral versions of the figures, tables, and text values identified in PG&E’s response to Question No. 1, below. Please note that PG&E is continuing to work to produce risk-neutral versions of some of the identified values and will supplement this response as soon as possible to provide them.

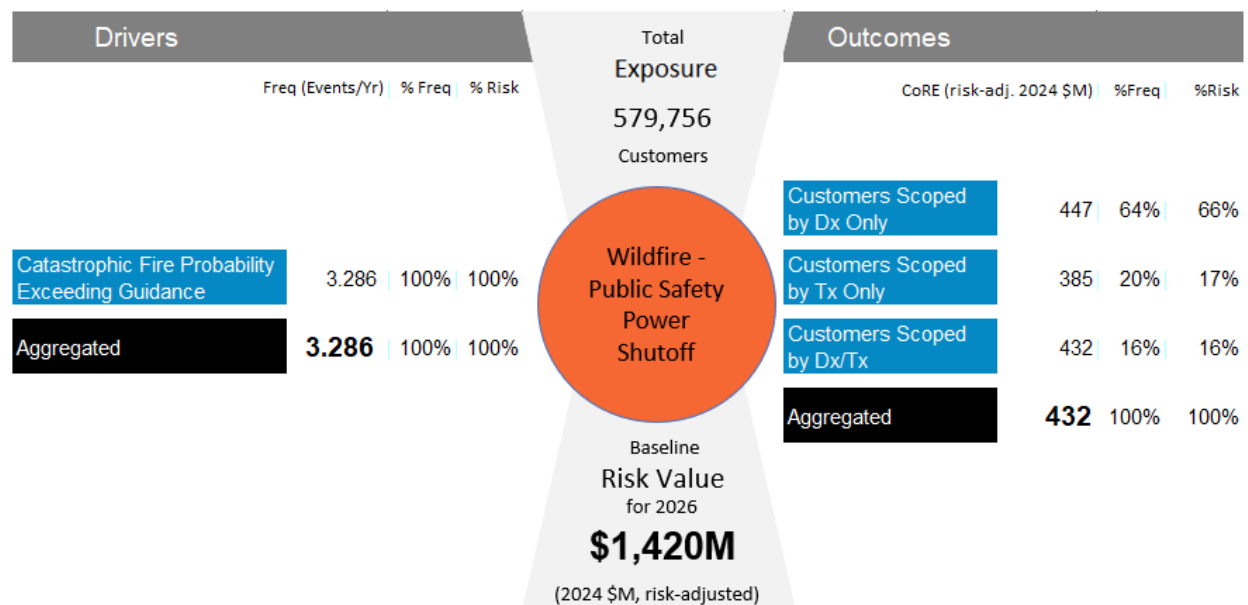
a. The following figures are regenerated without a risk scaling function on the April 2025 vintage models² for the 2026 Baseline:

² April 2025 vintage models are the models that were used in the 2027 GRC Application.

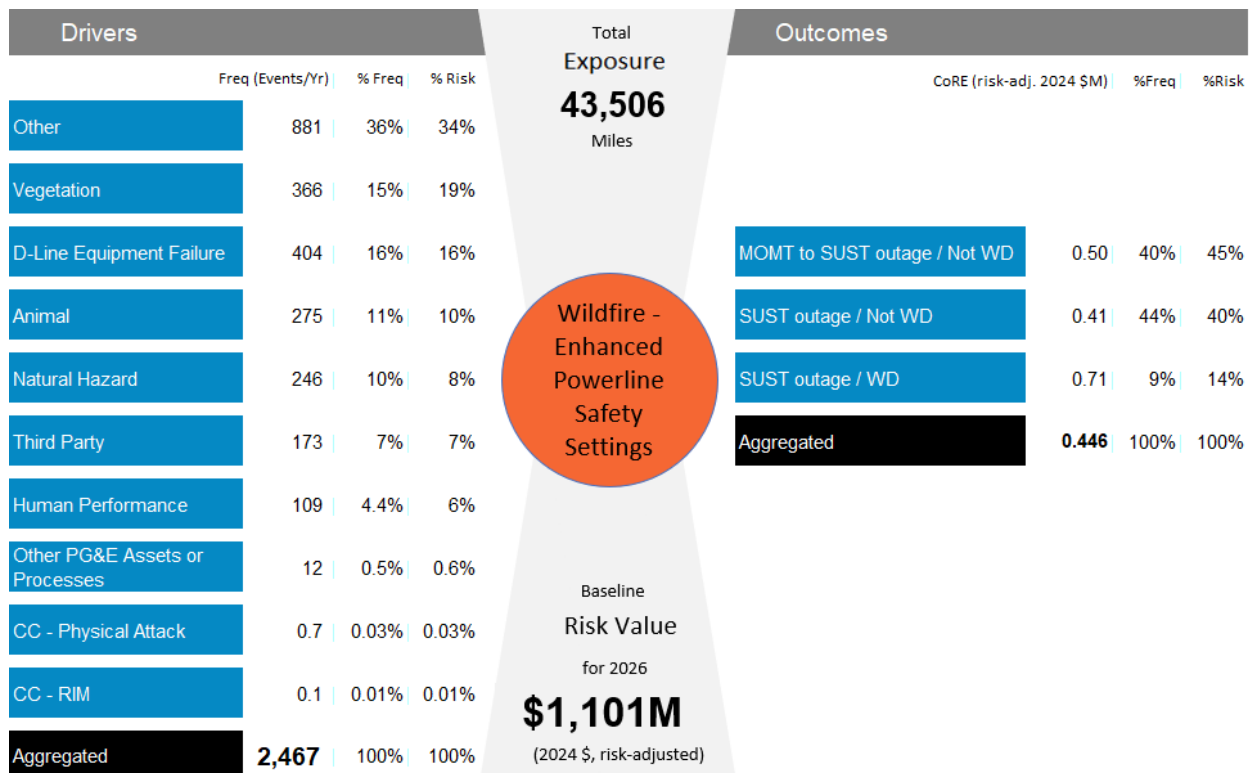
- Figure PG&E-5.1.1-2 Risk Bow Tie for Wildfire Risk (Risk Neutral, April 2025 vintage).



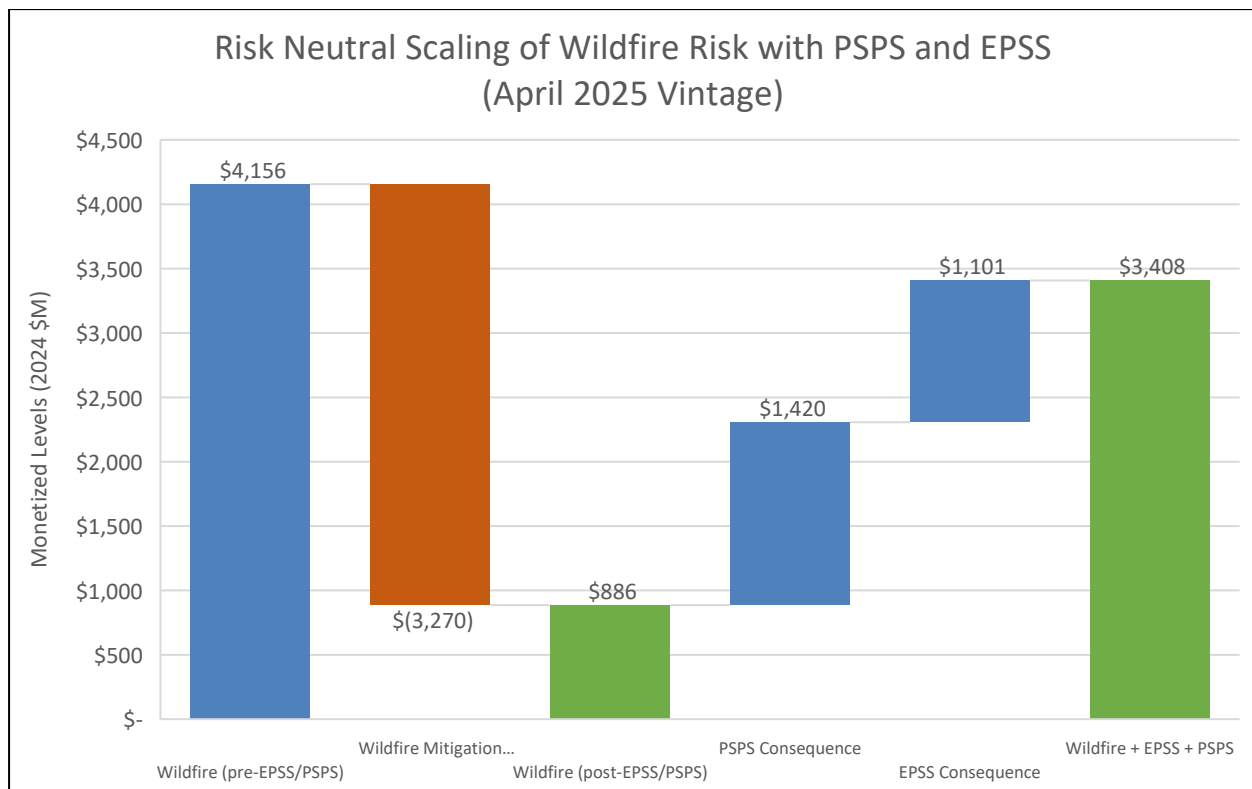
- Figure PG&E-5.1.1-3 Risk Bow Tie for PSPS Risk (Risk Neutral, April 2025 vintage).



- Figure PG&E-5.1.1-4 Risk Bow Tie for EPSS (Risk Neutral, April 2025 vintage).



- Figure PG&E-6.1.3.2-1 2026 Year Baseline (With and Without Operational Mitigation).



b. The following tables are regenerated without a risk scaling function:

- Table PG&E-6.1.3-1 Mitigation Effectiveness Alone and In Combination

Line No.	System Hardening Mitigation(s)	Blended Average Effectiveness (a)
1	Undergrounding All ^(b)	99%
2	Undergrounding Primary ^(c) Distribution Lines	98%
3	Line Removal with Remote Grid	98%
4	Covered Conductor + EPSS + PSPS ^(d)	96%
5	Covered Conductor + EPSS + DCD	79%
6	Covered Conductor	67%

(a) This effectiveness evaluation is based on an assessment of each mitigation's prevention of an ignition from active faults of known cause on overhead assets. Company initiated outages, including PSPS outages, outages of Unknown cause, as well as outages on existing underground assets are not applicable to this study and are excluded from calculation results as "N/A."

(b) Includes distribution primary, secondary, and services line(s).

(c) Includes distribution secondary and services parallel to targeted primary line(s).

(d) The combined "Overhead with EPSS and PSPS" effectiveness differs from others in the table as it is the result of two independent studies. The first study yields PSPS effectiveness alone to be approximately 83% effective at mitigating wildfire risk. Subsequently, the combined effectiveness of approximately 79 percent for "Overhead with EPSS" is applied on top of the PSPS reduction, resulting in: Mitigation Effectiveness = 83% + (100%-83%) * 79% = 96%.

• Table 6-3: Risk Impact of Activities

Activity	Activity Section #	Activity - Effectiveness - Overall Risk	Activity - Effectiveness - Wildfire Risk	Activity - Effectiveness - Outage Program Risk	Cost-Benefit Score - Overall Risk(d)	Cost-Benefit Score - Wildfire Risk(d)	Cost-Benefit Score - Outage Program Risk(d)	% HFTD Covered	% HFTD/ HFRA Covered	Expected % Risk Reduction	Model Used to Calculate Risk Impact
Covered conductor installation(a)	8.2.1	62%	67%	23%	4.4	3.7	0.7	2.9%	2.9%	2.5%	WDRM v4
Undergrounding of electric lines and/or equipment	8.2.2	98%	98%	100%	2.2	1.6	0.6	4.3%	4.3%	5.2%	WDRM v4
PSPS(b)	7	70%	95%	(59)%	(2.8)	8.4	(11.2)	100%	100%	NA	WDRM v4
EPSS(c)	8.2.8	45%	65%	(73)%	3.5	7.7	(4.3)	100%	100%	NA	WDRM v4
HFTD/HFRA distribution backlog tags	8.6.2	NA	14%	NA	0.1	0.1	0.0	75%	75%	1.9%	WDRM v4
Pole clearing	9.4	NA	20%	NA	1.9	0.6	1.2	7.9%	7.8%	0.3%	WDRM v4
Distribution routine patrol	9.2.1	NA	6%	NA	0.8	0.5	0.4	100%	100%	1.8%	WDRM v4
Service drops/ breakaway connectors	8.2.10.6	NA	80%	NA	1.0	1.0		0.6%	0.6%	0.02%	WDRM v4
Transmission shunt splice installation	8.4.9.2	NA	88%	NA	7.6	5.6	2.0	NA	0.7%	0.2%	WTRM v2
Transmission conductor segment replacement	8.2.5.1	NA	75%	NA	2.2	0.8	1.5	NA	0.4%	0.1%	WTRM v2
<p>(a) Effectiveness of covered conductor installation does not include the effect of line removal. Line removal effectiveness is 100 percent.</p> <p>(b) This figure represents catastrophic wildfire effectiveness.</p> <p>(c) This figure represents the effectiveness of EPSS at reducing ignitions under R3 and above FPI conditions.</p> <p>(d) CBR values exclude foundational costs except for PSPS and EPSS.</p>											

- Table PG&E-8.2.1-3 Ignition Mitigation Effectiveness Representative Blended Average Values.

	Blended Average Effectiveness ^(a)
System Hardening Scenarios	
Underground All (Underground Primary Lines, Secondary Lines and Services)	99%
Underground Primary Distribution Lines	98%
Line Removal w/ Remote Grid	98%
Covered Conductor with EPSS and PSPS ^(b)	96%
Covered Conductor with EPSS and DCD	79%
Covered Conductor	67%

Note: Assumptions – Analysis assumes no overhead degradation for life of the asset.

- (a) This effectiveness evaluation is based on an assessment of each mitigation's prevention of an ignition from active faults of known cause on overhead assets. Company-initiated outages, including PSPS outages, outages of Unknown cause, as well as outages on existing underground assets are not applicable to this study and are excluded from calculation results as "N/A."
- (b) The combined "Overhead with EPSS and PSPS" effectiveness differs from others in the table as it is the result of two independent studies. The first study yields PSPS effectiveness alone to be approximately 84 percent effective at mitigating wildfire risk. Subsequently, the combined effectiveness of approximately 79 percent for "Overhead with EPSS" is applied on top of the PSPS reduction, resulting in: Mitigation Effectiveness = $84\% + (100\% - 84\%) * 79\% = 97\%$.

- Appendix F, Table 5-5 Summary of Top-Risk Circuits, Segments, or Spans

Risk Ranking	Circuit, Segment, or Span ID	Unscaled Overall Utility Risk Score	Unscaled Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles (HFTD)	Version of Risk Model Used
1	CLAYTON 2212681608	25.15	19.70	5.45	Wildfire	33.22	WDRM v4
2	VACAVILLE 1103CB	19.91	0.28	19.64	Wildfire & PSPS	0.00	WDRM v4
3	BALCH NO 1 1101105414	19.48	19.47	0.01	Wildfire	7.45	WDRM v4
4	PLACERVILLE 21067522	18.48	14.40	4.08	Wildfire	73.53	WDRM v4
5	CLOVERDALE 1102672	18.38	16.75	1.63	Wildfire	22.45	WDRM v4
6	PLACERVILLE 210611132	18.10	13.25	4.85	Wildfire	44.47	WDRM v4
7	EL DORADO PH 210119752	16.37	11.79	4.58	Wildfire	41.58	WDRM v4
8	APPLE HILL 2102836878	15.32	6.45	8.88	Wildfire & EPSS	43.89	WDRM v4
9	STANISLAUS 1701CB	15.32	13.22	2.10	Wildfire	38.52	WDRM v4
10	BIG BEND 1101CB	15.31	10.99	4.32	Wildfire & PSPS	23.51	WDRM v4
11	MIDDLETOWN 1101644756	15.24	13.84	1.40	Wildfire	15.26	WDRM v4
12	CORNING 110185152	14.83	10.26	4.57	Wildfire & PSPS	25.52	WDRM v4
13	REDBUD 1101323962	14.50	7.75	6.75	Wildfire & PSPS	16.91	WDRM v4
14	MIDDLETOWN 1101548	14.42	8.80	5.62	Wildfire & PSPS	31.27	WDRM v4
15	OAKHURST 1103CB	14.10	2.05	12.05	Wildfire & EPSS	30.46	WDRM v4
16	BIG BEND 1101641808	14.08	10.00	4.08	Wildfire & PSPS	29.53	WDRM v4
17	MARIPOSA 210237282	13.98	12.29	1.68	Wildfire	53.25	WDRM v4
18	WEST POINT 11024788	13.85	11.62	2.23	Wildfire	74.27	WDRM v4
19	CALPINE 1144CB	13.81	12.54	1.27	Wildfire	26.76	WDRM v4
20	SILVERADO 2104633600	13.73	9.57	4.16	Wildfire & PSPS	25.06	WDRM v4

Risk Ranking	Circuit, Segment, or Span ID	Unscaled Overall Utility Risk Score	Unscaled Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles (HFTD)	Version of Risk Model Used
21	COLUMBIA HILL 1101CB	13.40	10.78	2.61	Wildfire	47.94	WDRM v4
22	CALAVERAS CEMENT 1101502	13.23	11.59	1.65	Wildfire	37.93	WDRM v4
23	RINCON 1101576	13.22	0.23	12.99	Wildfire & PSPS	3.93	WDRM v4
24	FROGTOWN 170113412	13.12	8.06	5.07	Wildfire	43.04	WDRM v4
25	CURTIS 17048140	13.02	11.01	2.01	Wildfire	38.04	WDRM v4
26	ALLEGHANY 1102CB	12.96	12.72	0.24	Wildfire	18.79	WDRM v4
27	APPLE HILL 110413512	12.86	7.01	5.85	Wildfire & PSPS	31.28	WDRM v4
28	BONNIE NOOK 1102CB	12.78	7.47	5.31	Wildfire & PSPS	30.18	WDRM v4
29	PINE GROVE 1102269286	12.45	5.56	6.89	Wildfire, PSPS, & EPSS	31.64	WDRM v4
30	CALAVERAS CEMENT 1101544800	12.34	12.14	0.20	Wildfire	23.54	WDRM v4
31	VACAVILLE 11046542	12.11	1.64	10.47	Wildfire & PSPS	12.18	WDRM v4
32	PUEBLO 2103678	12.06	8.96	3.11	Wildfire	36.71	WDRM v4
33	APPLE HILL 110497086	11.72	9.97	1.76	Wildfire	28.40	WDRM v4
34	PLACERVILLE 21069712	11.66	9.34	2.32	Wildfire	26.16	WDRM v4
35	TEMPLETON 2113A12	11.61	11.28	0.33	Wildfire	41.36	WDRM v4
36	APPLE HILL 21029722	11.61	9.89	1.71	Wildfire	40.09	WDRM v4
37	FORT ROSS 112170288	11.42	11.21	0.22	Wildfire	25.01	WDRM v4
38	VACAVILLE 110838316	11.42	10.16	1.26	Wildfire	15.73	WDRM v4
39	APPLE HILL 21028372	11.25	7.29	3.96	Wildfire	59.03	WDRM v4
40	AUBERRY 1101R2578	11.15	8.67	2.48	Wildfire	47.51	WDRM v4
41	PINE GROVE 11026080	11.10	9.90	1.20	Wildfire	34.88	WDRM v4
42	GIRVAN 11011330	11.08	7.64	3.44	Wildfire & PSPS	26.00	WDRM v4
43	HIGHLANDS 1103520	11.06	8.80	2.26	Wildfire	48.00	WDRM v4

Risk Ranking	Circuit, Segment, or Span ID	Unscaled Overall Utility Risk Score	Unscaled Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles (HFTD)	Version of Risk Model Used
44	MARIPOSA 2101752630	10.96	10.93	0.03	Wildfire	19.24	WDRM v4
45	COARSEGOLD 210410110	10.94	8.83	2.11	Wildfire	52.31	WDRM v4
46	FORESTHILL 11011802	10.89	6.56	4.33	Wildfire & PSPS	25.45	WDRM v4
47	ORO FINO 1101CB	10.85	3.63	7.23	Wildfire & PSPS	21.37	WDRM v4
48	VACAVILLE 110847860	10.80	0.26	10.54	Wildfire & PSPS	0.31	WDRM v4
49	TEJON 1102732836	10.78	4.68	6.11	Wildfire & PSPS	17.45	WDRM v4
50	TEMPLETON 2113CB	10.48	0.19	10.29	Wildfire & EPSS	0.07	WDRM v4
51	ORO FINO 11012022	10.43	1.74	8.70	Wildfire & PSPS	21.86	WDRM v4
52	SILVERADO 2103CB	10.34	0.54	9.80	Wildfire, PSPS, & EPSS	0.35	WDRM v4
53	APPLE HILL 21021532	10.32	5.59	4.73	Wildfire & EPSS	40.40	WDRM v4
54	ELECTRA 1101CB	10.32	8.87	1.45	Wildfire	23.97	WDRM v4
55	PARADISE 11042206	10.31	0.17	10.14	Wildfire & PSPS	1.40	WDRM v4
56	CALAVERAS CEMENT 1101CB	10.29	1.86	8.42	Wildfire & EPSS	10.49	WDRM v4
57	STILLWATER 11021466	10.28	7.31	2.97	Wildfire & PSPS	23.25	WDRM v4
58	WYANDOTTE 110777578	10.26	1.02	9.24	Wildfire & PSPS	21.18	WDRM v4
59	SHADY GLEN 1101941844	10.25	6.22	4.03	Wildfire & PSPS	17.89	WDRM v4
60	VACAVILLE 1104CB	10.25	0.17	10.08	Wildfire & PSPS	0.44	WDRM v4
61	DIAMOND SPRINGS 1103467046	10.24	0.82	9.43	Wildfire & EPSS	17.68	WDRM v4
62	APPLE HILL 2102186912	10.19	6.51	3.68	Wildfire	61.95	WDRM v4
63	ORO FINO 110239154	10.16	6.11	4.05	Wildfire & PSPS	47.05	WDRM v4
64	HIGHLANDS 1102628	10.12	9.91	0.21	Wildfire	19.38	WDRM v4
65	MOLINO 1102318	10.11	9.50	0.62	Wildfire	27.80	WDRM v4
66	HARTLEY 1101698	10.01	9.78	0.24	Wildfire	21.28	WDRM v4

Risk Ranking	Circuit, Segment, or Span ID	Unscaled Overall Utility Risk Score	Unscaled Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles (HFTD)	Version of Risk Model Used
67	MARIPOSA 210237288	9.99	9.08	0.91	Wildfire	87.02	WDRM v4
68	PARADISE 1105CB	9.93	1.56	8.37	Wildfire, PSPS, & EPSS	20.12	WDRM v4
69	MARTELL 110191216	9.92	9.66	0.26	Wildfire	41.59	WDRM v4
70	PLACERVILLE 21061104	9.90	5.12	4.77	Wildfire & PSPS	52.93	WDRM v4
71	CORNING 11021622	9.82	8.79	1.03	Wildfire	35.39	WDRM v4
72	PEORIA 170190090	9.75	7.05	2.70	Wildfire	30.44	WDRM v4
73	CEDAR CREEK 1101CB	9.58	6.27	3.31	Wildfire & PSPS	50.09	WDRM v4
74	CURTIS 170390320	9.57	8.45	1.12	Wildfire	32.11	WDRM v4
75	BRUNSWICK 11021010	9.56	8.65	0.91	Wildfire	47.09	WDRM v4
76	SILVERADO 2104632	9.55	6.85	2.70	Wildfire	18.81	WDRM v4
77	DIAMOND SPRINGS 11057722	9.53	8.30	1.23	Wildfire	62.18	WDRM v4
78	WYANDOTTE 1110747922	9.46	0.58	8.88	Wildfire & PSPS	10.65	WDRM v4
79	GIRVAN 11019732	9.40	5.17	4.24	Wildfire & PSPS	21.97	WDRM v4
80	MOUNTAIN QUARRIES 21011130	9.29	8.09	1.20	Wildfire	21.48	WDRM v4
81	DIAMOND SPRINGS 110676088	9.26	8.92	0.34	Wildfire	34.24	WDRM v4
82	GEYSERVILLE 1102904170	9.25	7.31	1.94	Wildfire	21.44	WDRM v4
83	EL DORADO PH 21016852	9.25	4.65	4.60	Wildfire & PSPS	28.19	WDRM v4
84	OREGON TRAIL 110335002	9.13	2.50	6.64	Wildfire & PSPS	54.72	WDRM v4
85	RINCON 1102644	9.13	0.11	9.02	Wildfire & PSPS	0.00	WDRM v4
86	WEIMAR 11012058	9.10	5.09	4.00	Wildfire & PSPS	30.87	WDRM v4
87	PARADISE 1105878870	9.04	2.33	6.72	Wildfire, PSPS, & EPSS	13.68	WDRM v4
88	SILVERADO 210478268	8.99	4.35	4.64	Wildfire & PSPS	13.60	WDRM v4
89	MARIPOSA 21019400	8.87	6.63	2.24	Wildfire & EPSS	64.24	WDRM v4

Risk Ranking	Circuit, Segment, or Span ID	Unscaled Overall Utility Risk Score	Unscaled Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles (HFTD)	Version of Risk Model Used
90	CURTIS 170384944	8.84	4.33	4.51	Wildfire & EPSS	59.83	WDRM v4
91	LAYTONVILLE 1101518	8.78	8.11	0.67	Wildfire	2.16	WDRM v4
92	MARIPOSA 210110070	8.77	8.69	0.08	Wildfire	26.28	WDRM v4
93	ORO FINO 11022090	8.76	3.43	5.33	Wildfire & PSPS	17.45	WDRM v4
94	DOBBINS 11011264	8.71	4.51	4.20	Wildfire & PSPS	28.45	WDRM v4
95	SHADY GLEN 11022232	8.56	3.77	4.79	Wildfire & PSPS	21.70	WDRM v4
96	SAN JOAQUIN #2 1103CB	8.55	5.60	2.95	Wildfire	67.53	WDRM v4
97	BALCH NO 1 1101406582	8.53	8.53	0.00	Wildfire	3.78	WDRM v4
98	COALINGA NO 2 11059260	8.48	8.33	0.15	Wildfire	0.00	WDRM v4
99	APPLE HILL 1103CB	8.42	2.45	5.97	Wildfire, PSPS, & EPSS	21.14	WDRM v4
100	HOPLAND 11014626	8.37	7.37	0.99	Wildfire	25.90	WDRM v4
101	FORESTHILL 1102359542	8.35	6.42	1.93	Wildfire	19.43	WDRM v4
102	LOS OSITOS 21037014	8.28	8.22	0.06	Wildfire	0.00	WDRM v4
103	PLACERVILLE 2106935216	8.22	7.28	0.94	Wildfire	21.78	WDRM v4
104	REDBUD 1102432	8.18	0.24	7.95	Wildfire & PSPS	1.60	WDRM v4
105	WEST POINT 110234416	8.14	6.85	1.29	Wildfire	27.73	WDRM v4
106	FITCH MOUNTAIN 111324918	8.13	7.62	0.50	Wildfire	24.60	WDRM v4
107	REDBUD 1102523244	8.09	2.99	5.10	Wildfire & PSPS	16.18	WDRM v4
108	PIT NO 3 21011482	8.00	7.91	0.09	Wildfire	12.26	WDRM v4
109	RACETRACK 1703CB	7.99	2.72	5.27	Wildfire & EPSS	19.59	WDRM v4

- Appendix F, Table 6-1 PG&E Prioritized Areas Based on Overall Utility Risk

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
1	CLAYTON 2212681608	33.22	25.15	19.70	5.45	0.41%	Equipment failure, Vegetation contact, Contact from object
2	VACAVILLE 1103CB	0.00	19.91	0.28	19.64	0.33%	PSPS
3	BALCH NO 1 1101105414	7.45	19.48	19.47	0.01	0.32%	Equipment failure, Vegetation contact, Contact from object
4	PLACERVILLE 21067522	73.53	18.48	14.40	4.08	0.30%	Equipment failure, Vegetation contact, Contact from object
5	CLOVERDALE 1102672	22.45	18.38	16.75	1.63	0.30%	Equipment failure, Vegetation contact, Contact from object
6	PLACERVILLE 210611132	44.47	18.10	13.25	4.85	0.30%	Equipment failure, Vegetation contact, Contact from object
7	EL DORADO PH 210119752	41.58	16.37	11.79	4.58	0.27%	Equipment failure, Vegetation contact, Contact from object
8	APPLE HILL 2102836878	43.89	15.32	6.45	8.88	0.25%	Equipment failure, Vegetation contact, Contact from object, EPSS
9	STANISLAUS 1701CB	38.52	15.32	13.22	2.10	0.25%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
10	BIG BEND 1101CB	23.51	15.31	10.99	4.32	0.25%	Equipment failure, Vegetation contact, Contact from object, PSPS
11	MIDDLETOWN 1101644756	15.26	15.24	13.84	1.40	0.25%	Equipment failure, Vegetation contact, Contact from object
12	CORNING 110185152	25.52	14.83	10.26	4.57	0.24%	Equipment failure, Vegetation contact, Contact from object, PSPS
13	REDBUD 1101323962	16.91	14.50	7.75	6.75	0.24%	Equipment failure, Vegetation contact, Contact from object, PSPS
14	MIDDLETOWN 1101548	31.27	14.42	8.80	5.62	0.24%	Equipment failure, Vegetation contact, Contact from object, PSPS
15	OAKHURST 1103CB	30.46	14.10	2.05	12.05	0.23%	EPSS
16	BIG BEND 1101641808	29.53	14.08	10.00	4.08	0.23%	Equipment failure, Vegetation contact, Contact from object, PSPS
17	MARIPOSA 210237282	53.25	13.98	12.29	1.68	0.23%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
18	WEST POINT 11024788	74.27	13.85	11.62	2.23	0.23%	Equipment failure, Vegetation contact, Contact from object
19	CALPINE 1144CB	26.76	13.81	12.54	1.27	0.23%	Equipment failure, Vegetation contact, Contact from object
20	SILVERADO 2104633600	25.06	13.73	9.57	4.16	0.22%	Equipment failure, Vegetation contact, Contact from object, PSPS
21	COLUMBIA HILL 1101CB	47.94	13.40	10.78	2.61	0.22%	Equipment failure, Vegetation contact, Contact from object
22	CALAVERAS CEMENT 1101502	37.93	13.23	11.59	1.65	0.22%	Equipment failure, Vegetation contact, Contact from object
23	RINCON 1101576	3.93	13.22	0.23	12.99	0.22%	PSPS
24	FROGTOWN 170113412	43.04	13.12	8.06	5.07	0.21%	Equipment failure, Vegetation contact, Contact from object
25	CURTIS 17048140	38.04	13.02	11.01	2.01	0.21%	Equipment failure, Vegetation contact, Contact from object
26	ALLEGHANY 1102CB	18.79	12.96	12.72	0.24	0.21%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
27	APPLE HILL 110413512	31.28	12.86	7.01	5.85	0.21%	Equipment failure, Vegetation contact, Contact from object, PSPS
28	BONNIE NOOK 1102CB	30.18	12.78	7.47	5.31	0.21%	Equipment failure, Vegetation contact, Contact from object, PSPS
29	PINE GROVE 1102269286	31.64	12.45	5.56	6.89	0.20%	Equipment failure, Vegetation contact, Contact from object, PSPS, EPSS
30	CALAVERAS CEMENT 1101544800	23.54	12.34	12.14	0.20	0.20%	Equipment failure, Vegetation contact, Contact from object
31	VACAVILLE 11046542	12.18	12.11	1.64	10.47	0.20%	PSPS
32	PUEBLO 2103678	36.71	12.06	8.96	3.11	0.20%	Equipment failure, Vegetation contact, Contact from object
33	APPLE HILL 110497086	28.40	11.72	9.97	1.76	0.19%	Equipment failure, Vegetation contact, Contact from object
34	PLACERVILLE 21069712	26.16	11.66	9.34	2.32	0.19%	Equipment failure, Vegetation contact, Contact from object
35	TEMPLETON 2113A12	41.36	11.61	11.28	0.33	0.19%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
36	APPLE HILL 21029722	40.09	11.61	9.89	1.71	0.19%	Equipment failure, Vegetation contact, Contact from object
37	FORT ROSS 112170288	25.01	11.42	11.21	0.22	0.19%	Equipment failure, Vegetation contact, Contact from object
38	VACAVILLE 110838316	15.73	11.42	10.16	1.26	0.19%	Equipment failure, Vegetation contact, Contact from object
39	APPLE HILL 21028372	59.03	11.25	7.29	3.96	0.18%	Equipment failure, Vegetation contact, Contact from object
40	AUBERRY 1101R2578	47.51	11.15	8.67	2.48	0.18%	Equipment failure, Vegetation contact, Contact from object
41	PINE GROVE 11026080	34.88	11.10	9.90	1.20	0.18%	Equipment failure, Vegetation contact, Contact from object
42	GIRVAN 11011330	26.00	11.08	7.64	3.44	0.18%	Equipment failure, Vegetation contact, Contact from object, PSPS
43	HIGHLANDS 1103520	48.00	11.06	8.80	2.26	0.18%	Equipment failure, Vegetation contact, Contact from object
44	MARIPOSA 2101752630	19.24	10.96	10.93	0.03	0.18%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
45	COARSEGOLD 210410110	52.31	10.94	8.83	2.11	0.18%	Equipment failure, Vegetation contact, Contact from object
46	FORESTHILL 11011802	25.45	10.89	6.56	4.33	0.18%	Equipment failure, Vegetation contact, Contact from object, PSPS
47	ORO FINO 1101CB	21.37	10.85	3.63	7.23	0.18%	Equipment failure, Vegetation contact, Contact from object, PSPS
48	VACAVILLE 110847860	0.31	10.80	0.26	10.54	0.18%	PSPS
49	TEJON 1102732836	17.45	10.78	4.68	6.11	0.18%	Equipment failure, Vegetation contact, Contact from object, PPS
50	TEMPLETON 2113CB	0.07	10.48	0.19	10.29	0.17%	EPSS
51	ORO FINO 11012022	21.86	10.43	1.74	8.70	0.17%	PSPS
52	SILVERADO 2103CB	0.35	10.34	0.54	9.80	0.17%	PSPS, EPSS
53	APPLE HILL 21021532	40.40	10.32	5.59	4.73	0.17%	Equipment failure, Vegetation contact, Contact from object, EPSS
54	ELECTRA 1101CB	23.97	10.32	8.87	1.45	0.17%	Equipment failure, Vegetation contact, Contact from object
55	PARADISE 11042206	1.40	10.31	0.17	10.14	0.17%	PSPS

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
56	CALAVERAS CEMENT 1101CB	10.49	10.29	1.86	8.42	0.17%	EPSS
57	STILLWATER 11021466	23.25	10.28	7.31	2.97	0.17%	Equipment failure, Vegetation contact, Contact from object, PSPS
58	WYANDOTTE 110777578	21.18	10.26	1.02	9.24	0.17%	PSPS
59	SHADY GLEN 1101941844	17.89	10.25	6.22	4.03	0.17%	Equipment failure, Vegetation contact, Contact from object, PSPS
60	VACAVILLE 1104CB	0.44	10.25	0.17	10.08	0.17%	PSPS
61	DIAMOND SPRINGS 1103467046	17.68	10.24	0.82	9.43	0.17%	EPSS
62	APPLE HILL 2102186912	61.95	10.19	6.51	3.68	0.17%	Equipment failure, Vegetation contact, Contact from object
63	ORO FINO 110239154	47.05	10.16	6.11	4.05	0.17%	Equipment failure, Vegetation contact, Contact from object, PSPS
64	HIGHLANDS 1102628	19.38	10.12	9.91	0.21	0.17%	Equipment failure, Vegetation contact, Contact from object
65	MOLINO 1102318	27.80	10.11	9.50	0.62	0.17%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
66	HARTLEY 1101698	21.28	10.01	9.78	0.24	0.16%	Equipment failure, Vegetation contact, Contact from object
67	MARIPOSA 210237288	87.02	9.99	9.08	0.91	0.16%	Equipment failure, Vegetation contact, Contact from object
68	PARADISE 1105CB	20.12	9.93	1.56	8.37	0.16%	PSPS, EPSS
69	MARTELL 110191216	41.59	9.92	9.66	0.26	0.16%	Equipment failure, Vegetation contact, Contact from object
70	PLACERVILLE 21061104	52.93	9.90	5.12	4.77	0.16%	Equipment failure, Vegetation contact, Contact from object, PSPS
71	CORNING 11021622	35.39	9.82	8.79	1.03	0.16%	Equipment failure, Vegetation contact, Contact from object
72	PEORIA 170190090	30.44	9.75	7.05	2.70	0.16%	Equipment failure, Vegetation contact, Contact from object
73	CEDAR CREEK 1101CB	50.09	9.58	6.27	3.31	0.16%	Equipment failure, Vegetation contact, Contact from object, PSPS
74	CURTIS 170390320	32.11	9.57	8.45	1.12	0.16%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
75	BRUNSWICK 11021010	47.09	9.56	8.65	0.91	0.16%	Equipment failure, Vegetation contact, Contact from object
76	SILVERADO 2104632	18.81	9.55	6.85	2.70	0.16%	Equipment failure, Vegetation contact, Contact from object
77	DIAMOND SPRINGS 11057722	62.18	9.53	8.30	1.23	0.16%	Equipment failure, Vegetation contact, Contact from object
78	WYANDOTTE 1110747922	10.65	9.46	0.58	8.88	0.15%	PSPS
79	GIRVAN 11019732	21.97	9.40	5.17	4.24	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS
80	MOUNTAIN QUARRIES 21011130	21.48	9.29	8.09	1.20	0.15%	Equipment failure, Vegetation contact, Contact from object
81	DIAMOND SPRINGS 110676088	34.24	9.26	8.92	0.34	0.15%	Equipment failure, Vegetation contact, Contact from object
82	GEYSERVILLE 1102904170	21.44	9.25	7.31	1.94	0.15%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
83	EL DORADO PH 21016852	28.19	9.25	4.65	4.60	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS
84	OREGON TRAIL 110335002	54.72	9.13	2.50	6.64	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS
85	RINCON 1102644	0.00	9.13	0.11	9.02	0.15%	PSPS
86	WEIMAR 11012058	30.87	9.10	5.09	4.00	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS
87	PARADISE 1105878870	13.68	9.04	2.33	6.72	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS, EPSS
88	SILVERADO 210478268	13.60	8.99	4.35	4.64	0.15%	Equipment failure, Vegetation contact, Contact from object, PSPS
89	MARIPOSA 21019400	64.24	8.87	6.63	2.24	0.15%	Equipment failure, Vegetation contact, Contact from object, EPSS
90	CURTIS 170384944	59.83	8.84	4.33	4.51	0.14%	Equipment failure, Vegetation contact, Contact from object, EPSS

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
91	LAYTONVILLE 1101518	2.16	8.78	8.11	0.67	0.14%	Equipment failure, Vegetation contact, Contact from object
92	MARIPOSA 210110070	26.28	8.77	8.69	0.08	0.14%	Equipment failure, Vegetation contact, Contact from object
93	ORO FINO 11022090	17.45	8.76	3.43	5.33	0.14%	Equipment failure, Vegetation contact, Contact from object, PSPS
94	DOBBINS 11011264	28.45	8.71	4.51	4.20	0.14%	Equipment failure, Vegetation contact, Contact from object, PSPS
95	SHADY GLEN 11022232	21.70	8.56	3.77	4.79	0.14%	Equipment failure, Vegetation contact, Contact from object, PSPS
96	SAN JOAQUIN #2 1103CB	67.53	8.55	5.60	2.95	0.14%	Equipment failure, Vegetation contact, Contact from object
97	BALCH NO 1 1101406582	3.78	8.53	8.53	0.00	0.14%	Equipment failure, Vegetation contact, Contact from object
98	COALINGA NO 2 11059260	0.00	8.48	8.33	0.15	0.14%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Unscaled Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
99	APPLE HILL 1103CB	21.14	8.42	2.45	5.97	0.14%	Equipment failure, Vegetation contact, Contact from object
100	HOPLAND 11014626	25.90	8.37	7.37	0.99	0.14%	Equipment failure, Vegetation contact, Contact from object
101	FORESTHILL 1102359542	19.43	8.35	6.42	1.93	0.14%	Equipment failure, Vegetation contact, Contact from object, PSPS
102	LOS OSITOS 21037014	0.00	8.28	8.22	0.06	0.14%	Equipment failure, Vegetation contact, Contact from object, PSPS
103	PLACERVILLE 2106935216	21.78	8.22	7.28	0.94	0.13%	Equipment failure, Vegetation contact, Contact from object, PSPS
104	REDBUD 1102432	1.60	8.18	0.24	7.95	0.13%	Equipment failure, Vegetation contact, Contact from object
105	WEST POINT 110234416	27.73	8.14	6.85	1.29	0.13%	Equipment failure, Vegetation contact, Contact from object
106	FITCH MOUNTAIN 111324918	24.60	8.13	7.62	0.50	0.13%	Equipment failure, Vegetation contact, Contact from object

Priority	Circuit, Segment, or Span ID	HFTD Length (miles)	Unscaled Overall Utility Risk	Unscaled Wildfire Risk	Outage Program Risk	Percent of Unscaled Overall Utility Risk	Associated Risk Driver
107	REDBUD 1102523244	16.18	8.09	2.99	5.10	0.13%	Equipment failure, Vegetation contact, Contact from object, PSPS
108	PIT NO 3 21011482	12.26	8.00	7.91	0.09	0.13%	Equipment failure, Vegetation contact, Contact from object
109	RACETRACK 1703CB	19.59	7.99	2.72	5.27	0.13%	Equipment failure, Vegetation contact, Contact from object, EPSS

- c. The following formulas and sentences are regenerated without a risk scaling function on the April 2025 vintage models for the 2026 Baseline:

Page Number in WMP	Updated Text
Page 46	The overall utility risk is an aggregation of these three risks and risk values as presented below. Total Utility Risk Enterprise (CBA Value \$M) = (\$3,632M Distribution + \$479M Transmission + \$8M Substation) + (\$1,420M PSPS) + (\$1,100M EPSS) = \$6,639M
Page 102	PG&E found that: <ul style="list-style-type: none"> • There are 0 circuit segments that contribute more than 1 percent of the distribution system unscaled overall utility risk (Table 5-5, Column ">1% Total Utility Risk"). • After ranking the circuit segments from highest to lowest overall utility risk, the top 19 circuit segments contribute to the top 5 percent of the total unscaled overall utility risk. These are the top 19 segments in Table 5-5. • In Table 5-5, PG&E also includes the top 109 circuit segments that contribute to the top 20 percent of total unscaled overall utility risk to provide a more comprehensive representation of where the overall wildfire risk is concentrated.
Page 118	PG&E determined that 109 circuit segments contribute to the top 20 percent of cumulative unscaled overall utility risk
Page 128	The combination of covered conductor, EPSS and PSPS is approximately 96 percent effective at reducing ignition risk.

