

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

PG&E Data Request No.:	SPD_004-Q004
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_004-Q004
Request Date:	May 1, 2025
Requester DR No.:	CONF-SPD-PGE-WMP2026-004
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	June 20, 2025

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

QUESTION 004

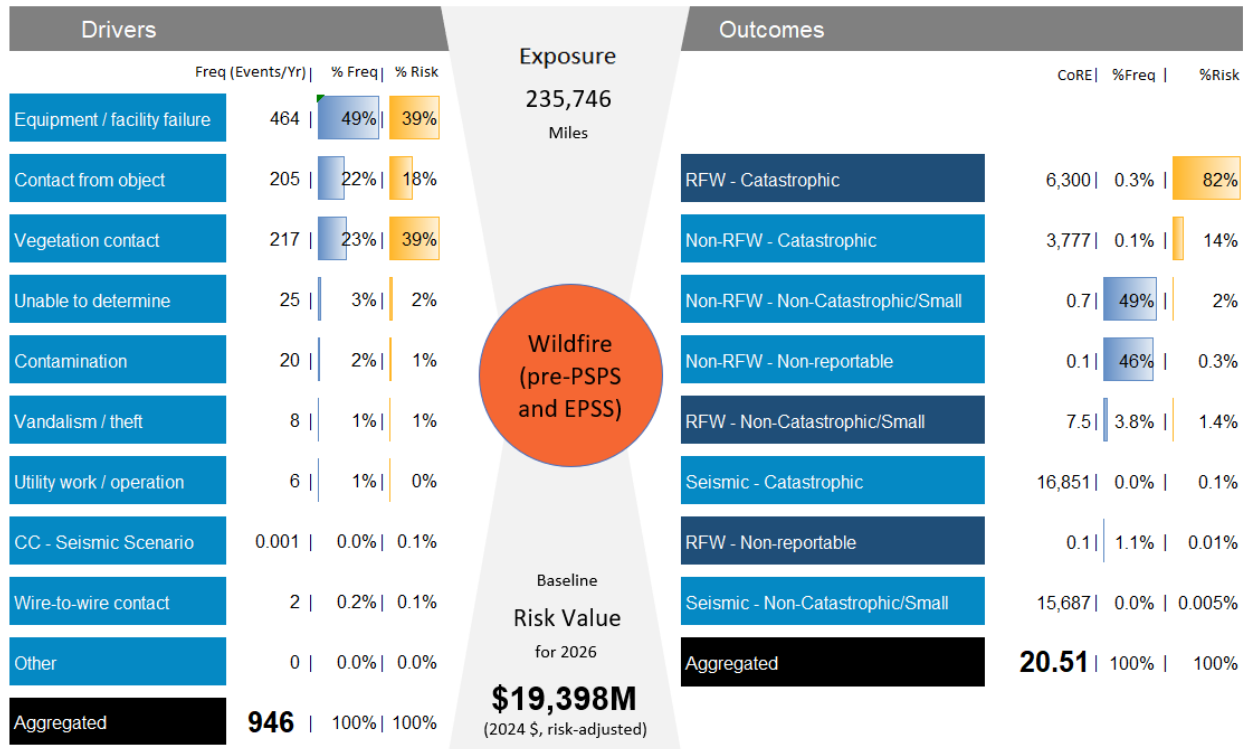
In an Administrative Law Judge Ruling dated April 22 2025 in the PG&E 2024 RAMP Proceeding (A.24-05-008), PG&E was directed to provide a parallel reliability cost calculation using the disaggregated approach recommended in the SPD Evaluation Report on PG&E's 2024 RAMP Application in preparation for PG&E's 2027 GRC Rate Case. For each of the locations listed in 3a.- 3c. provide a new calculation by applying the disaggregated approach recommended in the SPD Evaluation Report.

- a. If the values are in a figure, recreate the figure by applying the disaggregated approach recommended in the SPD Evaluation Report to the calculation that generated the value(s) in the figure.
- b. If the values are in a table, recreate the table by applying the disaggregated approach recommended in the SPD Evaluation Report 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 by applying the disaggregated approach recommended in the SPD Evaluation Report to the calculation.

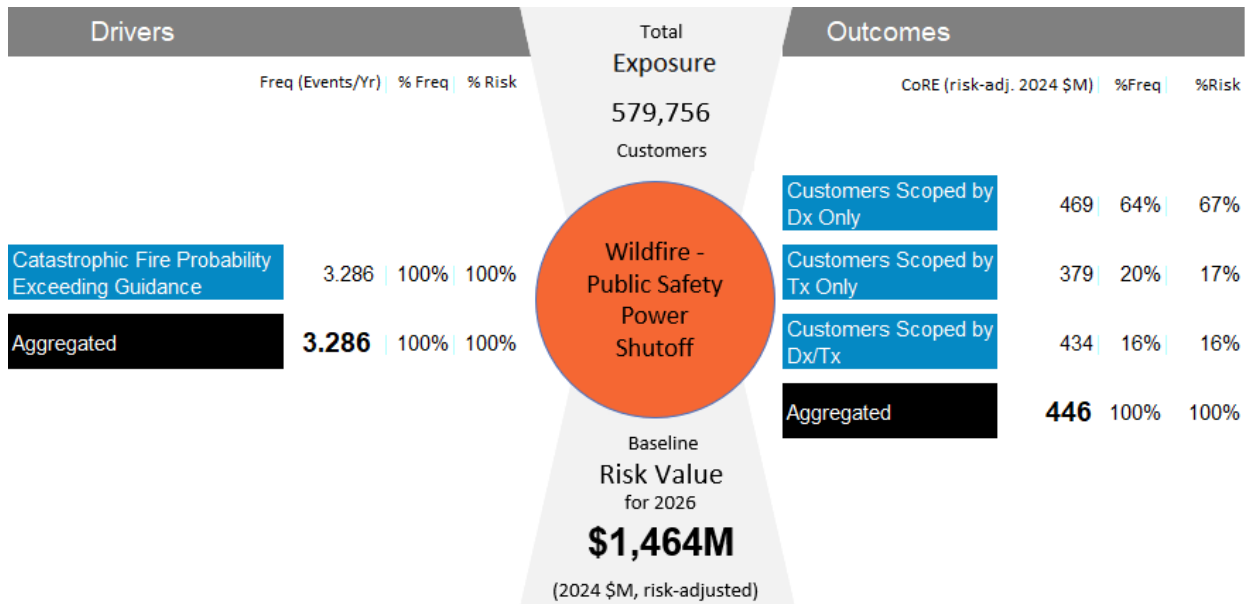
ANSWER 004

- a. The following figures are regenerated by applying the ICE 2.0 disaggregated values (\$0.08/CMI for residential, \$23.11/CMI for nonresidential) on the April 2025 vintage models for the 2026 Baseline:

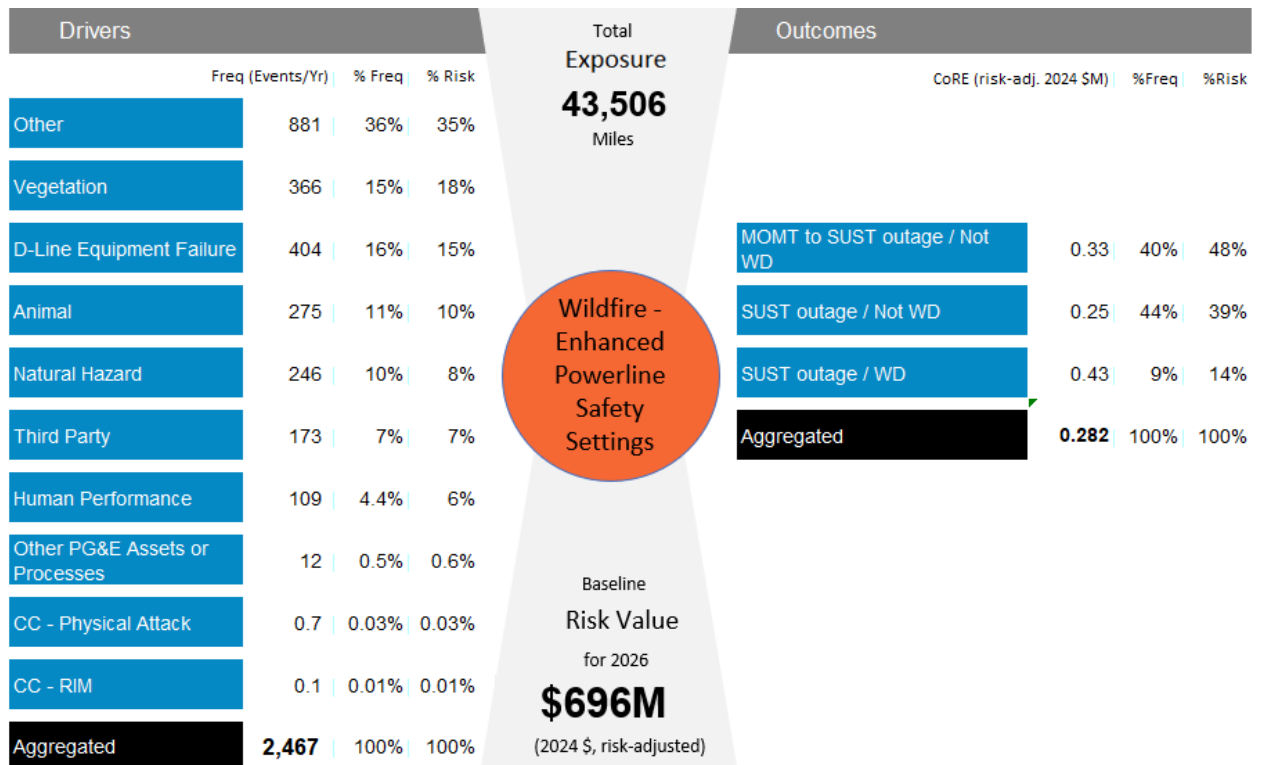
- Figure PG&E-5.1.1-2 Risk Bow Tie for Wildfire Risk



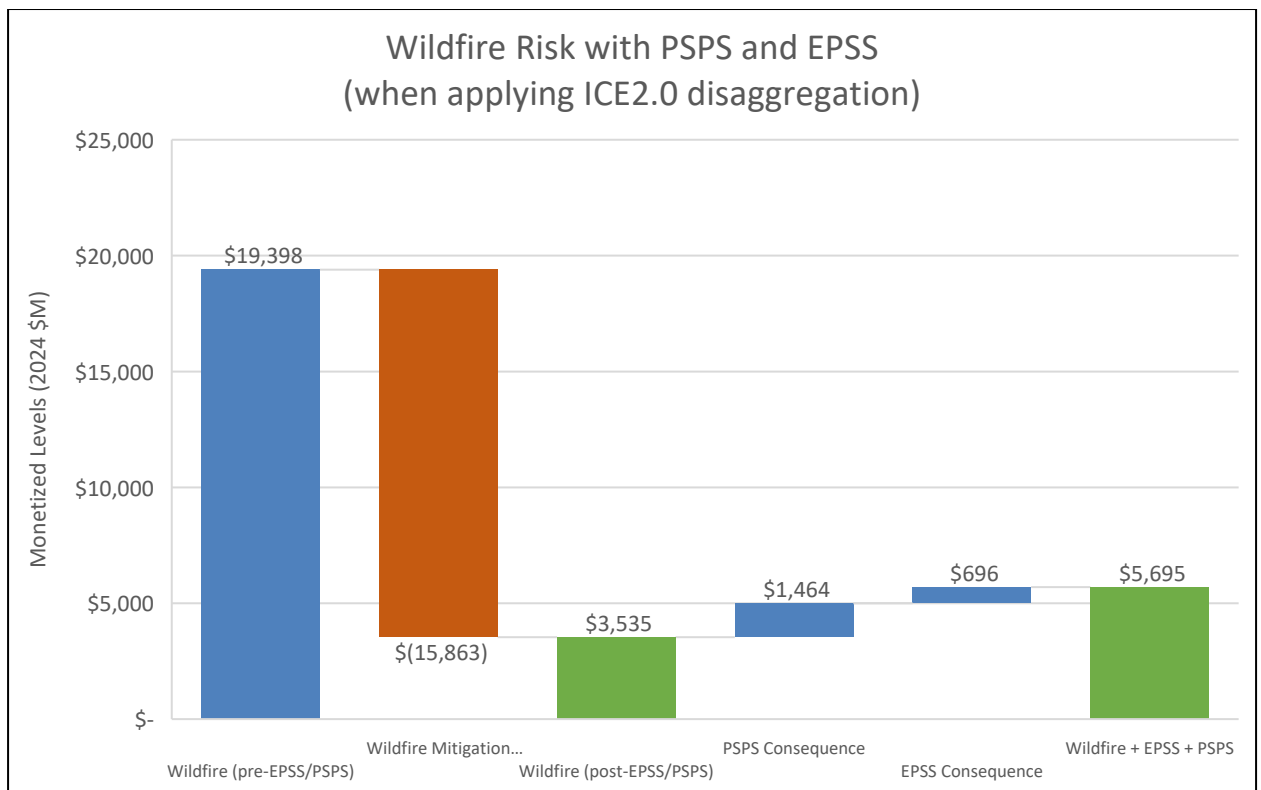
- Figure PG&E-5.1.1-3 Risk Bow Tie for PSPS Risk



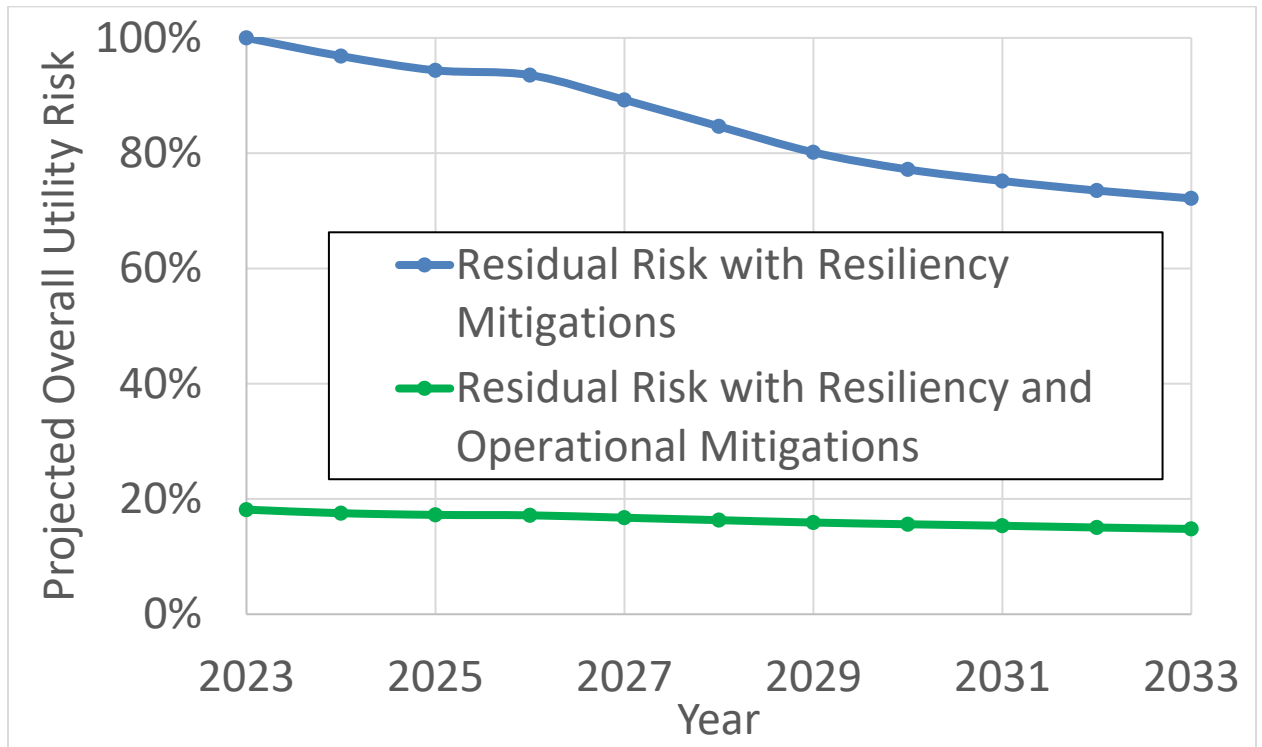
- Figure PG&E-5.1.1-4 Risk Bow Tie for EPSS



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



- Figure 6-1 Projected Overall Service Territory Risk



- b. The following tables are regenerated by applying the ICE 2.0 disaggregated values (\$0.08/CMI for residential, \$23.11/CMI for nonresidential):

• 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%	18.2	17.7	.5	2.9%	2.9%	3.4%	WDRM v4
Undergrounding of electric lines and/or equipment	8.2.2	98%	98%	100%	7.9	7.4	.5	4.3%	4.3%	6.5%	WDRM v4
PSPS(b)	7	70%	95%	(59)%	29.3	40.8	-11.5	100%	100%	NA	WDRM v4
EPSS(c)	8.2.8	45%	65%	(73)%	34.7	37.4	-2.7	100%	100%	NA	WDRM v4
HFTD/HFRA distribution backlog tags	8.6.2	NA	14%	NA	0.4	0.4	0.0	75%	75%	1.9%	WDRM v4
Pole clearing	9.4	NA	20%	NA	3.8	3.0	0.7	7.9%	7.8%	0.3%	WDRM v4
Distribution routine patrol	9.2.1	NA	6%	NA	2.5	2.2	0.3	100%	100%	1.8%	WDRM v4
Service drops/ breakaway connectors	8.2.10.6	NA	80%	NA	4.9	4.9	0.0	0.6%	0.6%	0.02%	WDRM v4
Transmission shunt splice installation	8.4.9.2	NA	88%	NA	28.6	27.3	1.3	NA	0.7%	0.2%	WTRM v2
Transmission conductor segment replacement	8.2.5.1	NA	75%	NA	4.8	3.8	1.0	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 5-5 Summary of Top-Risk Circuits, Segments, or Spans: Please see “WMP-Discovery2026-2028_DR_SPD_004-Q004Atch01.xlsx.”
 - Table 6-1 PG&E Prioritized Areas Based on Overall Utility Risk: Please see “WMP-Discovery2026-2028_DR_SPD_004-Q004Atch02.xlsx.”
 - Table 6-4 Summary of Risk Reduction for Top Risk Circuits: Please see “WMP-Discovery2026-2028_DR_SPD_004-Q004Atch03.xlsx.”
- c. The following formulas and sentences are regenerated by applying the ICE 2.0 disaggregated values (\$0.08/CMI for residential, \$23.11/CMI for nonresidential):

Page Number in WMP	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) = (\$16,919M Distribution + \$2,292M Transmission + \$36M Substation) + (\$1,464M PSPS) + (\$696M EPSS) = \$21,407M.
Page 102	<p>PG&E found that:</p> <ul style="list-style-type: none"> • There are 0 circuit segments that contribute more than 1 percent of the distribution system 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 15 circuit segments contribute to the top 5.21 percent of the total overall utility risk. These are the top 15 segments in Table 5-5. • In Table 5-5, PG&E also includes the top 86 circuit segments that contribute to the top 20 percent of total overall utility risk to provide a more comprehensive representation of where the overall wildfire risk is concentrated.
Page 118	PG&E determined that 86 circuit segments contribute to the top 20 percent of cumulative overall utility risk as shown in Table 6-1 below.
Page 152	Enterprise Risk (CBA) = (16,919 Dx + 2,292 Tx + 36 Sub) + 1,464 + 696 = 21,407

Page Number in WMP	Text
	<p>Overall Risk without EPSS = Overall Risk – EPSS Risk = 21,407 – 696 = 20,711</p> <p>Overall Risk with EPSS = Overall Risk without EPSS + EPSS Risk – Wildfire Risk Reduction from EPSS = 20,711 + 696 – 10,611 = 10,796</p> <p>Effectiveness = $(20,711 - 10,796) / 20,711 \times 100 = 48\%$</p> <p>Overall Risk without PSPS = Overall Risk – PSPS Risk = 21,407 – 1,464 = 19,943</p> <p>Overall Risk with PSPS = Overall Risk without PSPS + PSPS Risk – Wildfire Risk Reduction from PSPS = 19,943 + 1,464 – 16,257 = 5,150</p> <p>Effectiveness = $(19,943 - 5,150) / 19,943 \times 100 = 74\%$</p>
Page 157	<p>Enterprise Risk (CBA) = (16,919 Dx + 2,292 Tx + 36 Sub) + 1,464 + 696 = 21,407</p>