

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

PG&E Data Request No.:	SPD_004-Q012
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Requester DR No.:	CONF-SPD-PGE-WMP2026-004
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 6, 2025

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

QUESTION 012

Question 11e. highlights a marginal change in exposure for EPSS risk between the 2024 RAMP and 2026-2028 Base WMP filings. Questions 9e and 10e highlight a significant change in exposure for Wildfire and PSPS risk between the 2024 RAMP and 2026-2028 Base WMP filings. Explain why exposure to EPSS risk exhibits a marginal change, despite significant changes in the exposure to Wildfire and PSPS risk.

- a. The significant decrease in exposure to PSPS risk highlighted in Question 10e resulted in a significant decrease in risk value between the 2024 RAMP and 2026-2028 Base WMP filings.¹ The significant increase in exposure to Wildfire risk highlighted in Question 9e did not result in a significant increase in risk value between the 2024 RAMP and 2026-2028 Base WMP filings.² Explain why the change in exposure to PSPS risk resulted in a corresponding change in risk value, but the change in exposure to Wildfire risk did not result in a corresponding change in risk value.

ANSWER 012

EPSS risk is quantified as the difference between the Failure of Distribution Overhead Assets risk with and without EPSS. EPSS exposure is the mileage of overhead primary circuits that are EPSS capable. EPSS capable means the circuits could have EPSS enabled when the enablement criteria are met. Marginal change in EPSS exposure resulted in marginal change in EPSS risk. EPSS risk is not directly correlated to Wildfire and PSPS.

- a. PSPS risk had changes in customer count to drive a significant decrease in risk value. The Wildfire exposure is an error and should have read 235,746 miles.

¹ \$3,655 Million in the 2024 RAMP submission and \$1,953 Million in the 2026-2028 Base WMP.

² 19,633 Million in the 2024 RAMP submission and \$19,578 Million in the 2026-2028 Base WMP.