

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

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| <b>PG&amp;E Data Request No.:</b> | SPD_004-Q019                           |
| <b>PG&amp;E File Name:</b>        | WMP-Discovery2026-2028_DR_SPD_004-Q019 |
| <b>Request Date:</b>              | May 1, 2025                            |
| <b>Requester DR No.:</b>          | CONF-SPD-PGE-WMP2026-004               |
| <b>Requesting Party:</b>          | Safety Policy Division                 |
| <b>Requester:</b>                 | Edwin Schmitt                          |
| <b>Date Sent:</b>                 | May 9, 2025                            |

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

**QUESTION 019**

PG&E's Response to TURN-PG&E-3 Question 1 included the dataset titled WMPDiscovery2026- 2028\_DR\_TURN\_003-Q001Atch02CONF.xlsx. PG&E's Response to SPD-PGE-WMP2026-001 Question 2 included the same dataset titled WMPDiscovery2026-2028\_DR\_SPD\_001-Q002Supp01Atch01CONF.xlsx. Why do these datasets include TBD Orders where the Applicable Risk Model is Version 2 and Version 3?

- a. Why do these TBD Orders exhibit a pre-scoping status?
- b. Why do these TBD Orders only report Forecast UG Miles in 2027?
- c. Will WDRM v2 and v3 be used to scope projects that are Forecasted for 2028? If so, explain why.

**ANSWER 019**

"TBD" orders with an applicable risk model of v2 and v3 represent circuit protection zones (CPZs) which were originally identified for scoping when the applicable risk model was v2 or v3 at the time. These TBD orders fall into three categories:

1. **On Hold Projects:** Projects on these CPZs were paused following the 2023-2026 GRC decision. They will remain in a pre-scoping status and be re-evaluated and re-scoped under WDRM v4. There are 2 CPZs in this category representing approximately 37 miles.
2. **Carryover Projects:** These CPZs represent projects that will carry over from the current GRC period and will remain as v2 or v3 projects. The pre-scoping status was an error. There are six CPZs in this category representing approximately 5.6 miles.
3. **Inadvertently Included:** These CPZs were initially identified as potential undergrounding projects due to mitigations being previously planned on a portion of the CPZ prior to 2027. The high-level workplan was developed based on the assumption that remaining mileage on these CPZs should be mitigated. For TBD orders in category 3, these projects were inadvertently included and will not be

pursued as part of PG&E's 2027 workplan. There are four CPZs in this category representing less than 1 mile of work and 0.00085% risk reduction. Based on the current scoping process described by the System Hardening Project Scoping Decisions Trees: Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3, these projects would not have met the WDRM V4 criteria for inclusion in the work plan, and would not have proceeded beyond their inadvertent inclusion in this high-level workplan.

For categorization of each of the CPZs with TBD orders in v2 and v3, please reference the table below:

| Category                  | Circuit Protection Zone | Applicable Risk Model | 2027 Forecast UG Miles |
|---------------------------|-------------------------|-----------------------|------------------------|
| 1. On Hold Project        | PUEBLO 2103678          | v3                    | 36.5                   |
|                           | AUBERRY 110149122       | v2                    | 0.2                    |
| 2. Carryover Project      | MARIPOSA 210110240      | v3                    | 1.1                    |
|                           | WEST POINT 11014706     | v3                    | 1.7                    |
|                           | CALISTOGA 110143924     | v3                    | 2.4                    |
|                           | CALISTOGA 1101122350    | v3                    | 0.1                    |
|                           | MARIPOSA 21019400       | v3                    | 0.1                    |
|                           | MIDDLETOWN 1102302610   | v2                    | 0.2                    |
| 3. Inadvertently Included | CHALLENGE 11025462      | v2                    | 0.1                    |
|                           | MIRABEL 1101116         | v2                    | 0.0                    |
|                           | HIGHLANDS 1102623120    | v2                    | 0.1                    |
|                           | BIG MEADOWS 21012510    | v2                    | 0.5                    |

- a. At the time of PG&E's WMP submission, the 2027 and 2028 work plan had not yet been fully scoped. For purposes of estimating risk reduction associated with PG&E's GH-04 WMP initiative mileage target, PG&E identified a list of circuit segments that would be considered for scoping and thus when producing attachment *WMPDiscovery2026-2028\_DR\_SPD\_001-Q002Supp01Atch01CONF.xlsx* all line items with an end date in 2027 or 2028 were listed with a "pre-scoping" status. The workplan is dynamic and will continue to evolve as work is scoped in accordance with the System Hardening Project Scoping Decisions Trees provided in the WMP Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3.
- b. These TBD orders are only reported in 2027 because they were identified as part of the 2027 workplan.
- c. No, WDRM v2/v3 will not be used to scope projects forecasted for 2028 and beyond. However, if a project selected using v2 or v3 is delayed, it may carry over into 2028 and beyond.