

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

PG&E Data Request No.:	SPD_004-Q027
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_004-Q027
Request Date:	May 1, 2025
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 027

List all the feasibility constraints that are relevant to the decision trees found in Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3 in the 2026-2028 Base WMP.

- a. How are these feasibility constraints operationalized within these decision trees?
- b. How are these feasibility constraints quantified?
- c. How are these feasibility constraints addressed in PG&E's Cost Benefit Analysis?

ANSWER 027

PG&E objects that the request is overbroad because there are many potential feasibility constraints depending on the specific circumstances of a given case. Due to the extensive range of feasibility constraints that may be considered in the design of undergrounding, covered conductor, and line removal projects, it is impracticable, if not impossible, to enumerate all potential factors. Therefore, although the list provided below attempts to thoroughly set forth common feasibility constraints that significantly impact the program, it may not be an exhaustive list.

Below are primary examples of feasibility constraints considered within the scoping process :

- High-impact dependencies and permitting requirements from federal, state and local agencies.
- Soil impacts, such as granite/hard rock, waterway crossings, bio, cultural and environmental.
- Terrain impacts, such as the need for retaining walls, grading/access, and vegetation removal.
- Asbestos and other contaminants that are known to exist in the project scope.
- Construction and restoration restrictions such as bird nests, helicopter sets, special equipment.

- Easement and customer engagement limitations to building the scope
 - Constructability of alternatives whether it be due to overhead limitations or underground.
- a. Feasibility constraints are operationalized within the decision tree starting with a lead engineer who conducts a desktop feasibility review and determines a preliminary proposed scope that we compare to available alternatives. This preliminary proposed scope is sent out to a greater scoping team who completes a combination of field and desktop reviews targeted at the locations proposed for work. The various reviews are evaluated in a desktop scoping meeting where the proposed scope may be modified to ensure constructability and to address dependencies that may impact timing and cost.
 - b. Feasibility constraints influence the construction route of projects. For example, if there is steep terrain or significantly hard rock, the route will be adjusted based on the location of the constraints. Cost-related feasibility factors are incorporated into cost assumptions as a quantifiable cost modifier, which are then included in the estimated unit cost of the proposed construction.
 - c. During the scoping process, PG&E adjusts the estimated costs to account for feasibility constraints, including suggesting construction methodologies based on the feasibility factors identified. Going forward, PG&E's cost benefit analysis will account for the project-specific cost estimates including the feasibility constraints.