

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

<b>PG&amp;E Data Request No.:</b>	SPD_004-Q030
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_004-Q030
<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 30, 2025

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

**QUESTION 030**

Provide a detailed explanation of how PG&E applies the risk scaling function in its risk models presented in the 2026-2028 Base WMP?

- a. Is the risk scaling function applied to the EORM? If so, how? If not, why not?
- b. Is the risk scaling function applied to the WDRM? If so, how? If not, why not?
- c. Is the risk scaling function applied to the WTRM? If so, how? If not, why not?

**ANSWER 030**

- a. Yes, the same risk scaling function used in 2024 RAMP is applied to the EORM risk models presented in the 2026-2028 Base WMP. Please refer to 2024 RAMP Exhibit (PG&E-2), Chapter 2, Section C.6b, for the details on how PG&E applies the risk scaling function to convert monetized levels of an attribute into risk-adjusted levels of an attribute to prioritize the mitigation of risks characterized as low frequency/high consequence events, even though their expected loss might be the same as multiple high frequency events with low consequences.
- b. WDRM risk values are only scaled for calculating overall utility risk, which combines wildfire risk with outage program risk. For overall utility risk, the WDRM v4 risk results are scaled to match the absolute value of distribution wildfire risk determined by the EORM risk bow tie model. This is necessary because WDRM produces a set of relative, not absolute, risk values, and must be scaled before summing with other types of risks.
- c. WTRM risk values are only scaled for calculating overall utility risk, which combines wildfire risk with outage program risk. For overall utility risk, the WTRM v2 risk results are scaled to match the absolute value of transmission wildfire risk determined by the EORM risk bow tie model. This is necessary because WTRM produces a set of relative, not absolute, risk values, and must be scaled before summing with other types of risks.