

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

PG&E Data Request No.:	SPD_004-Q034
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Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 21, 2025

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

QUESTION 034

On page 125 in the 2026-2028 Base WMP, PG&E explains that when selecting a mitigation it considers relevant local factors on a case-by-case basis.

- a. Provide a list of local factors that PG&E considers when selecting a mitigation.
- b. Describe how this list of local factors was established by PG&E.
 - i. Were any other factors considered in this process but removed from the final list? If so, explain why.
- c. Describe how each of these local factors can inform mitigation selection.
- d. Describe how each of these local factors are integrated into 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.
 - i. Which of the steps in the decision-trees reviews these local factors? How is that performed?

ANSWER 034

- a. When a mitigation alternative is evaluated at the circuit segment level, all aspects of the decision tree are considered for the circuit segment. PG&E defines local factors (factors that are unique to that project location) to be the same as the qualitative factors described in response to WMP 2026-2028 SPD_004_Q33 (with the exception the PSPS factors, which is a quantitative measurement and included below). The primary local factors considered when selecting a mitigation include items listed below. Although the list provided below attempts to thoroughly set forth common local factors that PG&E considers when selecting a mitigation, it may not be an exhaustive list.
 - High tree strike potential, including an assessment of the current quantitative data provided by the vegetation management team.
 - Ingress/egress concerns and major historical fire data identified by the Public

Safety Specialist (PSS).

- Construction management feasibility assessment, which accounts for local geology, including presence of hard rock, steep terrain, and water crossings.
 - Environmental considerations, such as sensitive habitats.
 - Cultural or historical considerations, such as tribal lands.
 - Customer/community impacts, such as significant construction in a neighborhood by PG&E or another utility, or land rights and permitting challenges.
 - Public Safety Power Shutoff (PSPS) history in the area, assessed by reviewing the PSPS polygon data. The polygon data shows the area identified for each PSPS event in the lookback period that identifies which of the overhead assets will have required deenergization.
- b. PG&E's list of local factors was developed by participants in the cross-functional Scoping working groups who leverage their historical knowledge and local requirements. These participants offer feedback informed by their engagement with key stakeholders, such as agencies, cities, counties, tribes, and local communities, to ensure alignment with relevant local regulations and address local needs. This collective input helped shape the list, ensuring PG&E effectively addresses local considerations when selecting mitigations.
- i. No additional factors were considered but removed from the list.
- c. These local factors can inform PG&E's mitigation selection at two key stages leading up to and during the scoping process:
1. When PG&E completes its initial Cost Benefit Analysis (Figure 8.2.1-2), and a Circuit Protection Zone (CPZ) does not meet the Cost Benefit Ratio (CBR) and Net Benefit requirements for an undergrounding solution, PG&E initiates a hybrid analysis. As part of the hybrid analysis, PG&E considers local factors such as tree strike potential, ingress/egress, and/or PSPS polygons affecting the CPZ. PG&E continues the reevaluation of Overhead to Underground ratios until the CBR and Net Benefit requirements are met; in some cases, this analysis will result in a 100% covered conductor solution.

For example, a CPZ that is selected for a hybrid solution could have a section that has a high tree strike risk and a significant ingress/egress concern. In the feedback loop tool, PG&E would select the number of miles to underground due to tree strike potential, and the number of miles to underground based on ingress/egress concerns. These miles will be entered into the feedback loop tool to identify what ratio of OH and UG meets the CBR and Net Benefit requirements.
 2. PG&E also considers additional local factors in addition to tree strike, ingress/egress, and PSPS polygons, during the Desktop Scoping Meeting (Figure 8.2.1-3) and integrates these findings into our analysis (Figure 8.2.1-3).

For example, if a water crossing is identified, undergrounding that portion of the CPZ may not be the preferred solution, and an overhead solution would be applied instead.

- d. Local insights on any given project are discussed during the Hybrid Analysis and Desktop Scoping Meeting (Figures 8.2.1-2 and 8.2.1-3).
 - i. During the Hybrid Analysis, local insights are discussed as the first step in the second row “Begin Hybrid Analysis” (Figure 8.2.1-2).
During the Desktop Scoping Meeting, the cross-functional team reviews the local insights to answer the question “Are there any significant dependence or constructability limitations in the areas of impact?” (Figure 8.2.1-3).