

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

<b>PG&amp;E Data Request No.:</b>	SPD_004-Q035
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_004-Q035
<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 21, 2025

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

**QUESTION 035**

On page 132 in the 2026-2028 Base WMP, PG&E states that it looks at its “highest risk circuit segments” to determine where to target the work included in the WMP.

- a. Within these “highest risk circuit segments”, what aspects does PG&E consider in order to determine the timing of implementing mitigations on these “highest risk circuit segments”?
  - i. Does PG&E consider the LoRE and CoRE values of these circuit segments when determining the timing of implementing mitigations on these “highest risk circuit segments”? If so, how? If not, why not?

**ANSWER 035**

- a. PG&E is providing a response to this question for system hardening and undergrounding. PG&E selects system hardening and undergrounding based on the risk model’s ranking of the highest risk circuit segments. Other WMP programs reference the risk model but focus on addressing the location where the specific risk is present.

Circuit segments are selected for scoping from 1-N based on ignition risk rank. Certain circuit segments may be excluded if, for example, they are already hardened, are privately owned, are very short, or are already in a workplan. PG&E generally prioritizes execution of projects in the same order that scoping is completed. Once a project has completed scoping and other pre-construction activities (e.g. design, estimating and permitting) are complete, PG&E will begin construction as soon as practicable.

While our approach is to begin hardening as soon as practicable after scoping is complete, there are limiting factors identified through the design/estimating and permitting process that impact when projects can be implemented, such as:

- Construction management feasibility which accounts for local geology, including presence of hard rock, steep terrain, water crossings;

- Environmental considerations including sensitive habitats;
- Cultural or historical considerations including tribal lands; and
- Customer/community impacts, such as significant construction in a neighborhood by PG&E or another utility, land rights and/or permitting challenges.

When it seems like a project may be delayed, PG&E also works to improve timing (complete mitigations more quickly) by separating projects into multiple phases and/or sub-phases and limiting the timing constraints to smaller sections of work.

- i. No, LoRE and CoRE values are not considered independently when planning for the sequencing and timing of projects or sub-projects. While both likelihood and consequence are important components of risk, their product (i.e., risk) is the primary focus when prioritizing mitigations. More specifically, PG&E uses the density of risk, such as risk per mile, to rank circuit segments 1-n. PG&E then prioritizes projects for execution in ascending risk rank order based on the model used at the time of selection, while considering the operational limitations noted in response to part a above.