

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

PG&E Data Request No.:	SPD_004-Q039Supp02
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_004-Q039Supp02
Request Date:	May 1, 2025
Requester DR No.:	CONF-SPD-PGE-WMP2026-004
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 13, 2025 (Original) Supp02: May 30, 2025

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

QUESTION 039

For Table 6-3 in the 2026-2028 Base WMP, PG&E provided an “Activity-Effectiveness-Wildfire Risk” value for each activity listed. However, for six of these activities PG&E did not provide Cost-Benefit Ratios.¹

- a. Provide the Cost-Benefit Ratios for each of these activities as is required by D.22-12-027.
- b. If these calculations of CBR vary from what was submitted in PG&E’s 2024 RAMP Application, explain how much they vary and why.²
- c. Complete Table 6-3 for all activities listed in this WMP. Add the Initiative Activity Tracking ID as a column in the completed Table. Present this completed version of Table 6-3 in an Excel spreadsheet.

ANSWER 039 SUPPLEMENTAL 02

- c. PG&E included all of the activities that have a quantified risk reduction value in Table 6-3. Other mitigation programs listed within the WMP are either qualitative in nature or measured in terms of visualizing where risk could manifest. For example, an inspection of a structure does not reduce risk. It does however allow us to identify non-conformances. The inspection metric is measured as “eyes-on-risk” and is not a true measure of risk reduction. For these reasons, there are no additional programs to be added to Table 6-3.

¹ These were described as Cost-Benefit Scores in Table 6-3, which was likely a typo in the WMP guidelines.

² See for instance calculations for backlog tags in 2024 RAMP Workpaper titled EO-WLDFR-3a_CBR Input File (Dx Backlog and Control).xlsx.

ANSWER 039 SUPPLEMENTAL 01 – SENT MAY 21, 2025

- a. This table has been updated to include the two transmission programs (conductor segment replacement and shunt splice installation) cost benefit scores. Additionally, the PSPS and EPSS CBR were updated as an error was noted in the original submission.

WMP activity name	Cost Benefit Ratio - Overall Risk (2026-2028)	Cost-Benefit Ratio - Wildfire Risk (2026-2028)	Cost Benefit Ratio - Outage Program Risk (2026-2028)
PSPS (2027-2030 CBR)	25.3	41.5	-16.2
EPSS (2027-2030 CBR)	33.8	38.1	-4.3
Transmission – Shunt Splice Installation	30.43	28.36	2.07
Transmission – Conductor Segment Replacement	5.43	3.93	1.5

*CBRs exclude foundational costs

ANSWER 039

- a. The following table uses 2026-2028 program Cost-Benefit Ratios (CBR) values (unless otherwise noted) from the enterprise risk models and investment planning forecasts to be submitted as part of our May 2027 GRC filing. The two transmission programs (conductor segment replacement and shunt splice installation) cost benefit scores are currently unavailable and will be provided later.

WMP activity name	Cost Benefit Score - Overall Risk (2026-2028)	Cost-Benefit Score - Wildfire Risk (2026-2028)	Cost Benefit Score - Outage Program Risk (2026-2028)
HFTD/HFRA distribution backlog tags	0.4	0.4	0.0
Service drops/breakaway connectors	5.0	5.0	0.0
Pole Clearing	4.3	3.1	1.2
Distribution routine patrol	2.6	2.2	0.4
Covered conductor installation	18.7	17.9	0.7
Undergrounding of electric lines and/or equipment	8.1	7.5	0.6
PSPS (2027-2030 CBR)	23.3	45.4	-22.0
EPSS (2027-2030 CBR)	33.8	38.1	-4.3

*CBRs exclude foundational costs. PSPS and EPSS CBR's were updated in supplemental 01 table above.

- b. The table below compares the RAMP CBRs and CBRs provided in subpart (a). The original CBR submitted in Table 6-3 are based on February vintage GRC bowties and analysis that was available at the time of the 2026-2028 WMP filing. The values

provided in subpart (a) are from PG&E's finalized bowties and analysis to be submitted in our May filing of the 2027 GRC using Baseline 2026. A brief description on the variance drivers are described below.

Item Number	WMP Activity Name	2024 RAMP CBR (2026-2028)	GRC Filing CBR (WMP Period 2026-2028)
a	HFTD/HFRA distribution backlog tags	2.7	0.4
b	Service drops/breakaway connectors	N/A	5.0
c	Pole Clearing	2.0	4.3
d	Distribution routine patrol	3.1	2.6
e	Covered conductor installation	17.0	18.7
f	Undergrounding of electric lines and/or equipment	6.9	8.1
g	PSPS (2027-2030 CBR)	42.8	23.3
h	EPSS (2027-2030 CBR)	51.9	33.8

*Excludes foundational cost except for PSPS and EPSS CBRs

- a) Reduction driven by higher percentage of pole work that has a lower CBR value when compared to non-pole capital and expense projects
- b) New program for 2027 GRC
- c) Increase driven by a lower estimated unit cost of work and refreshed outage to ignition ratio when compared to RAMP filing
- d) Risk Reduction from RAMP to GRC is lower while costs remained relatively the same
- e) Increase driven by the exclusion of secondary and service mile scoped
- f) Reduction driven by the increase in allocated costs tied to PSPS
- g) Reduction driven by lower EPSS effectiveness