

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

PG&E Data Request No.:	SPD_004-Q040
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Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
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SUBJECT: MITIGATION COST EFFICIENCY ASSESSMENT (SPD-PGE-WMP2026-004)

QUESTION 040

On page 152 in the 2026-2028 Base WMP, PG&E provides an explanation for how it calculated Activity Effectiveness – Overall Utility Risk. The total value for Wildfire Risk (Dx, Tx, Sub) is \$19,424 Million. Explain why this value is different from the \$19,578 Million expressed in Figure 6.1.3.2-1.

- a. Explain why the PSPS and EPSS values here are presented as “Risk” but in Figure 6.1.3.2-1 these values are referred to as “Consequence”.
- b. Explain why the value of Wildfire Risk (Dx, Tx, Sub) is different, but the values for PSPS and EPSS Risk on page 152 remain exactly the same as the values for PSPS and EPSS Consequence in Figure 6.1.3.2-1.

ANSWER 040

The value expressed in Figure 6.1.3.2-1 is the aggregated baseline risk value and includes underground. This is why the sum of the Dx, Tx, and Sub Wildfire Risk differs on page 152 from Figure 6.1.3.2-1.

- a. “Consequence” in Figure 6.1.3.2-1 means the total consequence of all risk events which represents the same value as “Risk” on page 15. This is because Risk Value is calculated as the product of Exposure, Likelihood of Risk Event (LoRE) and Consequence of Risk Event (CoRE), and as such, the words Risk and Consequence are used interchangeably from page 152 to Figure 6.1.3.2-1.
- b. The \$19,424 million value of Wildfire Risk (Dx, Tx, Sub) on page 152 includes overhead distribution, overhead transmission, and substation wildfire risk, whereas the \$19,578 million value in Figure 6.1.3.2-1 also includes underground wildfire risk. The values for PSPS and EPSS Risk on page 152 remain exactly the same as the values for PSPS and EPSS Consequence in Figure 6.1.3.2-1 for the reason explained in the answer to subpart (a) above.