

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

<b>PG&amp;E Data Request No.:</b>	SPD_005-Q003
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_005-Q003
<b>Request Date:</b>	May 13, 2025
<b>Requester DR No.:</b>	SPD-PGE-WMP2026-005
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	May 16, 2025

**SUBJECT: FOLLOW-UP TO PG&E’S RESPONSE TO SPD-001 QUESTION 21  
(SPD-PGE-WMP2026-005)**

Provide responses to the items listed below. This will remain an open data request.

**QUESTION 003**

For 2024, the QDR indicates that GM-03’s unit of measure is “# of Distribution EC Tags”. PG&E’s response to SPD-001 Question 21 records a percentage of 73.4%. Explain what this difference means. Why PG&E presented GM-03 as a percentage in its response to SPD-001 Question 21.

- a. PG&E states that “Costs for GM-03 are not separated but included in the Activity level ' Equipment maintenance and repair”. Did PG&E report on GM-03 in the QDR in this manner? If not, explain why PG&E updated SPD-001 Question 21 in this way.

**ANSWER 003**

In PG&E’s 2023-25 WMP, PG&E defines the unit of measure for GM-03 (HFTD/HFRA Open Tag Reduction – Distribution Backlog) with two components: (1) the number of EC notifications to be closed each year; and (2) a percentage of risk reduction that would be achieved by closing the tags.<sup>1</sup> PG&E acknowledges that it has inconsistently presented these units in past QDRs, but has represented the bipartite nature of this unit of measure definition by providing the number of distribution EC tags for Table 1 of the QDR and the percentage of risk reduction for Table 12. This is also represented in both the 2023 and 2024 Annual Reports on Compliance where we provide both the numbers of tags closed as well as the percentage of risk reduction achieved in Table 3. For 2024, the 73.4% backlog ignition risk reduction corresponds to 53,526 backlog ignition risk tags closed.<sup>2</sup>

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<sup>1</sup> See 2023-2025 Wildfire Mitigation Plan R8, February 13, 2025 p. 391.

<sup>2</sup> See PG&E’s Annual Report on Compliance for 2024, Table 3.

- a. PG&E does not separate out costs for GM-03 in the QDR. It is rolled up under the Activity Equipment maintenance and repair.