

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

<b>PG&amp;E Data Request No.:</b>	SPD_006-Q006
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_006-Q006
<b>Request Date:</b>	May 20, 2025
<b>Requester DR No.:</b>	SPD-PGE-WMP2026- 006
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	May 22, 2025

**SUBJECT: FOLLOW-UP 2026-2028 BASE WMP DATA REQUESTS (SPD-PGE-WMP2026-006)**

**QUESTION 006**

In a meeting on May 9th to discuss the Wildfire Benefit Cost Analysis (WBCA) Tool, PG&E informed SPD that the baseline value of risk used to calculate CBR is different in the 2024 RAMP and the WBCA Tool.

- a. Provide a detailed step by step explanation of how CBR is calculated for the 2024 RAMP and WBCA Tool. This should include an example with a table that is similar Table PG&E-6.2.1.2-2 in the 2026-2028 Base WMP but should continue through to the entire CBR calculation.
  - i. In the narrative answer to this question highlight the differences in the baseline value of risk used in each approach. Explain any other differences.
- b. Explain why PG&E decided to use a baseline value of risk to calculate the CBR in the WBCA Tool that was different than the baseline value of risk used to calculate CBR in the 2024 RAMP.

**ANSWER 006**

- a. Pursuant to agreement with SPD, PG&E will provide this response on May 28, 2025.
- b. Historically, the near permanent mitigation of wildfire risk through infrastructure upgrades has been the focus of most system hardening initiatives. Outage programs, such as EPSS and PSPS, are operational mitigations that reduce wildfire risk at the expense of reliability risk. However, to maintain focus on only the infrastructure upgrades, neither the wildfire risk reduction nor the reliability risk increase resulting from EPSS and PSPS were included in the combined CBRs in PG&E's 2024 RAMP.

The WBCA is being developed to comply with EUP requirements to simultaneously analyze the comprehensive costs versus benefits of system hardening mitigations relative to both Wildfire Risk and Outage Program Risk. To do so, PG&E had to

adopt a methodology which accounts for the risk trade-offs associated with operational mitigations.