

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

PG&E Data Request No.:	SPD_07-Q003
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_007-Q003
Request Date:	June 2, 2025
Requester DR No.:	SPD-PGE-WMP2026-007
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	June 5, 2025

**SUBJECT: FOLLOW-UP ON MITIGATION EFFECTIVENESS IN 2026-2028 BASE
WMP (SPD- PGE-WMP2026-007)**

Provide responses to the items listed below.

QUESTION 003

For lines where the wildfire risk is mitigated by undergrounding the primary lines, does PG&E have criteria for PSPS or expect to use PSPS on these lines? Explain

- a. What role does the remaining risk from overhead hardened secondary lines play in the decision to continue to use PSPS on circuit segments where the primary lines have been undergrounded (assuming no upstream lines are subject to PSPS)? Explain.

ANSWER 003

The purpose of PSPS is to ensure that primary overhead lines are de-energized when there is a significant weather risk from an offshore wind event. As such, PSPS criteria is primarily influenced by the weather rather than the inherent wildfire risk alone. Primary underground lines are not targeted in the PG&E PSPS process. However, underground lines may become de-energized due to criteria being met upstream or downstream of the undergrounded circuit segment.

- a. Secondary lines, whether hardened or unhardened, do not impact the decision to initiate a PSPS event. Only primary lines influence the scope of the PSPS event.