

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

PG&E Data Request No.:	SPD_07-Q005
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_007-Q005
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 005

In part c of “WMP-Discovery2026-2028_DR_SPD_003-Q009.pdf,” PG&E stated the estimated risk reduction was approximate for WDRM v4 because the circuit segments may not match up. Question 9 of SPD-PGE-WMP2026-003 requested risk reduction information for work from 2023-2026 using WDRM v4; meaning that work on a circuit segment could have been performed in 2023. PG&E’s response to Question 9 would be logical if WDRM v4 was based off a snapshot of 2025 circuit segments because some of the undergrounding work in question was performed on circuit segments in 2023 and 2024. However, SPD understands that the circuit segments in WDRM v4 are based off a Jan 2023 snapshot of the circuit segments. Since these two timeframes are essentially the same, why would the risk values provided by WDRM v4 risk model not be representative of the risk reduced by projects in 2023, 2024, 2025 and 2026?

ANSWER 005

PG&E’s historic workplans are recorded based on circuit segment names rather than geospatial asset data. In the 2023-2026 period, most of the work constructed was planned using a prior version of the WDRM, and cannot be accurately represented using WDRM v4B. As stated in PG&E’s response to part c of WMP-Discovery2026-2028_DR_SPD_003-Q009, actual circuit segmentation varies over time and there is no guarantee that a project originally targeted on a circuit segment will still lie within the bounds of that same circuit segment’s namesake in the updated risk model. Said another way, PG&E’s grid topology is not static and can be affected by increased or reduced sectionalization, line removal, line addition, such as new business installations, or other changes.

For example, the circuit segment labeled Hoopa 1101CB contained 39.24 miles of primary overhead according to the GIS snapshot utilized in WDRM v3; however, the circuit segment labeled Hoopa 1101CB in WDRM v4 contains only 0.02 primary overhead miles. Conversely, the circuit segment labeled Molino 1103CB contained only

8.78 miles of primary overhead according to the GIS snapshot utilized in WDRM v3; however, the circuit segment labeled Molino 1103CB in WDRM v4 contains 31.05 primary overhead miles. The risk reduction achieved by mitigation of either of the aforementioned circuit segments would vary significantly if assessed based on WDRM v3 versus v4.