

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

<b>PG&amp;E Data Request No.:</b>	SPD_008-Q001
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_008-Q001
<b>Request Date:</b>	June 23, 2025
<b>Requester DR No.:</b>	SPD-PGE-WMP2026-008
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	July 3, 2025

**SUBJECT: ICE CALCULATOR 2.0 FOLLOW-UP (SPD-PGE-WMP2026-008)**

**QUESTION 001**

On June 20, 2025, PG&E served a Compliance Filing in response to an April 22, 2025 ALJ ruling in A.24-05-008 requiring PG&E to disaggregate its approach generating a monetized value of electric reliability using the Interruption Cost Estimator (ICE) calculator. In its Compliance Filing, PG&E stated that “PG&E has addressed the ALJ ruling requirement using the ICE 2.0 calculator rather than the ICE 1.0 calculator.” PG&E also presented eight workpapers in Appendices A and B. Appendix A included the Excel file named “Appendix A1\_PG&E 2027 GRC Risk Values with Electric Reliability Scenarios.xlsx” with a spreadsheet called “PG&E 2027GRC Risk Values”. Explain what are the values associated with Column’s F and N (i.e. the “ICE 1.0 disaggregated” values) in spreadsheet “PG&E 2027GRC Risk Values” and what approach was used to generate those values.

- a. Is the approach used to generate the values described as “ICE 1.0 disaggregated” the same as the approach used to generate the values in the RM-RMCBR-14 PG&E 2024 RAMP Risk Values\_ICECalcAdj\_by\_Event (add DUNGD).xlsx workbook that PG&E submitted with its supplemental response to the RAMP-2024\_DR\_SPD\_002 data request on July 31, 2024?
  - i. If not, explain what approach was used to generate the “ICE 1.0 disaggregated” values in PG&E 2027GRC Risk Values.
  - ii. If not, explain why PG&E did not use the approach recommended by the SPD evaluation report as requested in the ALJ Ruling from April 22, 2025.
- b. List each of the monetized value(s) of electric reliability that PG&E generated using the ICE Calculator that then led to results in Columns E, F, G and H in the “PG&E 2027GRC Risk Values” spreadsheet. This should be presented in \$/CML.
  - i. Explain how PG&E generated each of these values with reference to the offline ICE models used by PG&E.

## ANSWER 001

PG&E objects to this request because it is not related to the WMP proceeding and exceeds the scope of that proceeding. This request would be more appropriately served as non-case discovery or in a different regulatory proceeding. Notwithstanding and without waiving this objection, PG&E responds as follows.

“Electric Reliability (ICE 1.0 disaggregated)” values in Column F of sheet “PG&E 2027GRC Risk Values” in file Appendix A1 are the electric reliability risk values calculated using disaggregated approach based on ICE 1.0 results. Specifically, the disaggregated approach used tranche-level values of electric reliability attribute (\$/CMI), which were derived from ICE 1.0 \$/CMI values for residential and non-residential customers obtained using inputs consistent with \$3.33/CMI used in monetizing electric reliability risk in PG&E’s 2027 GRC filing. Please see below table for the ICE 1.0 VoS values.

Sector	ICE 1.0 \$/CMI
Residential	0.05
Non-Residential	29.17
All	3.33*

*Notes: \$3.33/CMI is used in monetizing electric reliability risk in PG&E’s 2027 GRC filing*

“Total Risk Value (ICE 1.0 disaggregated)” values in Column N are the sum of “Total Safety”, “Electric Reliability (ICE 1.0 disaggregated)”, “Gas Reliability” and “Financial” values in Columns D, F, I and J.

- a. The approach used to generate the values described as “ICE 1.0 disaggregated” was updated and enhanced in granularity to account for updating to ICE 2.0 and improving on the analysis originally used to generate the values supplied in the supplemental response to RAMP-2024\_DR\_SPD\_002 data request on July 31, 2024.

Further, to ensure consistency across the update, the approach used to generate the values described as “ICE 1.0 disaggregated” is the same as that used to generate the values described as “ICE 2.0 disaggregated” in Columns H&R in the same spreadsheet. The only additional step taken to get the values described as “ICE 1.0 disaggregate” is that PG&E needed to first combine the \$/CMI for Medium and Large Commercial and Industrial (ML C&I) customers with \$/CMI for Small Commercial and Industrial customers based on customer counts to get the \$/CMI for Non-Residential customers because ICE 1.0 calculator segregates Medium and Large C&I, Small C&I and Non-Residential customers in outputs.

The \$/CMI values used to get “ICE 1.0 disaggregate” values are updated from those used in the supplemental response to RAMP-2024\_DR\_SPD\_002 data request on July 31, 2024 due to annual update of customer counts, change of reliability input SAIDI, and adjusting for inflation from 2023 to 2024 to express values in 2024 dollars. The table below shows the comparison of \$/CMI values.

Sector	RAMP 2024 DR SPD 002 - ICE 1.0 (2023\$)	2027 GRC - ICE 1.0 (2024\$)
Medium and Large C&I	\$77.89	\$80.49
Small C&I	\$9.99	\$11.29

<b>Sector</b>	<b>RAMP 2024 DR SPD 002 - ICE 1.0 (2023\$)</b>	<b>2027 GRC - ICE 1.0 (2024\$)</b>
Residential	\$0.06	\$0.05
All Customers	\$3.17	\$3.33

The \$/CMI value for Medium and Large C&I customers and the \$/CMI value for Small C&I customers in Column “2027 GRC - ICE 1.0 (2024\$)” in the above table are then multiplied respectively with the percentage of Medium and Large C&I customers in Non-Residential sector and the percentage of Small C&I customers in Non-Residential sector to get the weighted average Non-Residential \$/CMI value of 29.17 as shown in the table below.

<b>Sector</b>	<b>2027 GRC - ICE 1.0 (2024\$)</b>
Non-Residential (ML C&I and Small C&L Weighted Average)	\$29.17
Residential	\$0.05

After obtaining the \$/CMI values for Residential and Non-Residential customers in the above table, PG&E followed the same approach which generates the values described as “ICE 2.0 disaggregated” in Columns H&R. PG&E applied the disaggregation approach at the tranche level of each risk model. For this, PG&E gathered Service Point (i.e., customer) level data to determine the percentage of Residential customers at the tranche level of PG&E’s electric risk models, and then took this percentage of Residential customers (%Residential) at the tranche level and multiply [%Residential] to (\$/Residential CMI) and [1-%Residential] to (\$/Non-Residential CMI) to get the weighted average \$/CMI value at the tranche level. This value is then used to monetize the modeled CMI value for the electric reliability attribute. With that, the Enterprise Risk Model runs were performed to calculate risk values in column F.

- i. As described above and in the following subpart b., PG&E believes it has fully complied with the ALJ Ruling from April 22, 2025 by using the disaggregation method recommended by SPD in its Evaluation Report and developed by PG&E starting with “RAMP-2024\_DR\_SPD\_002.pdf” and updating it and improving the granularity.
  - ii. See above response.
- b. Below table lists the monetized value(s) of electric reliability in \$/CMI that PG&E generated using the ICE Calculator that then led to results in Columns E, F, G and H in the “PG&E 2027GRC Risk Values” spreadsheet. Light grey shaded blank cells indicate not applicable.

<b>Customer Class</b>	<b>ICE1.0 Aggregated (Column E)</b>	<b>ICE1.0 Disaggregated (Column F)</b>	<b>ICE2.0 Aggregated (Column G)</b>	<b>ICE2.0 Disaggregated (Column H)</b>
Residential		0.05		0.08
Non-Residential		29.17		23.11
All	3.33		2.72	

i.

- For ICE1.0 Aggregated (Column E), we entered our residential and small, medium/large customer counts as well as all the annually updated PG&E specific input values into ICE calculator to get an overall \$/CMI.
- ICE1.0 Disaggregated (Column F) \$/CMI value of small and medium/large customers are combined to get a weighted average value for non-residential customers based on customer counts.
- For ICE2.0 Aggregated (Column G), we entered our residential and non-residential customer counts as well as all the annually updated PG&E specific input values into ICE calculator. We get an overall \$/CMI in 2023 dollars which is converted to 2024 dollars by applying inflation rate of 2.949% based on Consumer Price Index.
- For ICE2.0 Disaggregated (Column H) we entered our residential and non-residential customer counts as well as all the annually updated PG&E specific input values into ICE calculator to get an \$/CMI. We get \$/CMI in 2023 dollars which is converted to 2024 dollars by applying inflation rate of 2.949% based on Consumer Price Index.