

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

PG&E Data Request No.:	SPD_008-Q004
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_008-Q004
Request Date:	June 23, 2025
Requester DR No.:	SPD-PGE-WMP2026-008
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	July 3, 2025

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

QUESTION 004

In a supplemental response to SPD-PGE-WMP2026-004 Question 4, PG&E stated that it has responded to the data request by “applying the ICE 2.0 disaggregated values (\$0.08/CMI for residential, \$23.11/CMI for nonresidential)”. In its Compliance Filing in its 2027 GRC, PG&E stated “PG&E continues to stand by our 2027 GRC risk analysis using a system-wide, aggregated electric reliability value, developed based on the best judgment and analysis available at the time of GRC filing.”

- a. Confirm that by “aggregated electric reliability value” PG&E is referring to the “ICE 1.0 aggregated” values that were submitted with both the WMP and the initially 2027 GRC Application.
- b. Is PG&E considering using the ICE 2.0 calculator in a future WMP update? Explain.
- c. Is PG&E considering using the ICE 2.0 calculator in a future EUP submission to Energy Safety? Explain.
- d. If the answer to 4a. is yes and either 4b. or 4c. is yes, explain why PG&E stands by its “aggregated electric reliability value” using ICE 1.0 in its 2027 GRC filing.
 - i. Is PG&E concerned that standing behind one value in the 2027 GRC filing but standing behind another value in a future WMP update or future EUP submission would generate confusion? Explain.

ANSWER 004

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.

- a. Yes, “aggregated electric reliability value” refers to the “ICE 1.0 aggregated” values that were submitted with both the WMP and the initially 2027 GRC Application.
- b. PG&E is inclined to use the ICE 2.0 or more recent ICE calculator in updates to the WMP filing to benefit from the significant improvement in data and analysis

employed by ICE 2.0 compared with ICE 1.0 calculator, and to comply with the Risk-Based Decision-Making Framework Rulemaking (R.20-07-013) (RDF OIR)¹.

- c. PG&E intends to incorporate a disaggregated ICE 2.0 methodology for the forthcoming EUP filing. As indicated in EUP_SPD-PGE-SB884-018_DR-CPUC_D001_REM.pdf and EUP_SPD-PGE-SB884-017.pdf, PG&E is in the final stages of developing its Wildfire Benefit Cost Analysis (WBCA) too I— where this methodology will be implemented—and can share more information in July.
- d. Since the initial inception and first RAMP filings, PG&E, in partnership with the CPUC, the other IOUs, and Intervening Parties, has endeavored to constantly drive improvement in the Risk Framework. PG&E's 2027 GRC filing is based on available analysis and data that could be reasonably included. Electric reliability analysis is therefore based on ICE 1.0, and not ICE 2.0 that only became available a few weeks prior to the filing deadline. Models, data, and risk analysis are always subject to changes based on newly available information, and the GRC cannot be constantly updated. For example, further updates to ICE 2.0 are expected in 2025. ICE 2.0 currently does not consider PG&E (and other CA IOU) customer survey data. Thus, when LBNL releases updates to ICE 2.0, the values will be different from the results produced now. Regarding the disaggregated approach ordered by the ruling, as explained in PG&E's June 20 compliance filing, that approach requires further consideration in the Rulemaking proceeding. The disaggregated approach raises numerous issues, including the potential consequence of treating customers differently based on economic status, location, and other factors. For example, another method of performing the analysis assigns decreased priority for reliability improvements for customers who experience impactful outages such as PSPS and EPSS, and a lower value of outages to low income customers implying that reliability is less important for them. Such issues should be evaluated by the Commission before directing use of the disaggregated approach. Thus, PG&E affirms that it continues to stand by its 2027 GRC filing which is based on ICE 1.0 and a systemwide reliability approach.
 - i. PG&E cannot speculate as to whether the disaggregated approach required by the April 22, 2025 ALJ Ruling, and submitted on June 20, 2025 will cause “confusion” relative to the presentation of electric reliability in the 2027 GRC or future WMP and EUP submissions.

¹ D.22-12-027, p. 38 directs the utilities “to use the most current version of the LBNL ICE Calculator to determine a standard dollar valuation of electric reliability risk for the Reliability Attribute...”