

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

<b>PG&amp;E Data Request No.:</b>	SPD_012-Q001Supp01
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_012-Q001Supp01
<b>Request Date:</b>	August 8, 2025
<b>Requester DR No.:</b>	CONF-SPD-PGE-WMP2026-012
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	August 13, 2025 Supp01: August 22, 2025

**SUBJECT: ICE CALCULATOR VALUES FOR HFTD, NON-HFTD AND HFTD TIERS (SPD-PGE-WMP2026-012)**

**QUESTION 001**

In its response to Question 2 of SPD-PGE-WMP2026-008, PG&E stated that it cannot provide SPD with the offline ICE 2.0 model it used to generate values in the Compliance Filing submitted to A.25-05-009 on June 20 2025. PG&E states in its response that the \$/CMI values may also be generated through the online ICE 2.0 calculator using the inputs provided in AppendixB\_ICE10 to ICE20 Input Comparison.xlsx file of the Compliance Filing. SPD understands that these inputs from AppendixB\_ICE10 to ICE20 Input Comparison.xlsx represent PG&E's entire service territory. In its response to Question 1 of SPD-PGE-WMP2026-011, PG&E stated the following: "Kindly note that the values for the following categories remain consistent across HFTD and NonHFTD classifications, including HFTD Tier 2 and 3, Non-HFTD with EPSS, and Non-HFTD without EPSS:

- Residential BUG;
- • Residential Work From Home;
- • Non-Residential Manufacturing;
- • Non-Residential Health and Social;
- • Non-Residential Advanced Warning;
- • SAIDI; and
- • SAIFI.

This approach ensures that PG&E utilizes system-level estimates with greater statistical reliability, as opposed to granular segments that lack sufficient sample sizes. It also aligns with the methodology used in the 2027 GRC and maintains consistency with ICE 1.0." This is not what SPD was requesting, and so SPD is sending another data request.

- a. Complete the attached Excel workbook ICE 2.0 Inputs.xlsx. Follow the Instructions spreadsheet to complete the By HFTD and With EPSS spreadsheets.

- b. In the By HFTD spreadsheet, PG&E must comply with the following requirement: the fields in the spreadsheet **must** be filled out with information relevant to the HFTD or Non-HFTD, respectively.
- c. In the With EPSS spreadsheet, PG&E must comply with the following requirement: the spreadsheet **must** be filled out with information relevant to Tier 3, Tier 2, Non-HFTD with EPSS and Non-HFTD without EPSS, respectively.

**ANSWER 001 SUPPLEMENTAL 001 SENT – AUGUST 22, 2025**

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.

Please see attachment “*WMP-Discovery2026-2028\_DR\_SPD\_012-Q001Supp01Atch01 (ICE 2.0 Inputs 8.19).xlsx*”. Please note, the data that is being provided in this response is not inclusive of the data utilized to calculate Cost-Benefit Ratios in our 2026-2028 Base Wildfire Mitigation Plan. We are providing this information as requested; however, we do not utilize this data to inform our WMP or RAMP filings.

Notwithstanding the information provided with this response, PG&E continues to have concerns about estimating the reliability benefits on a granular geographic basis using the ICE calculator. For example, doing so could lead to underestimating the reliability benefits from improving service to disadvantaged and vulnerable communities. Additionally, the data and percentages presented in the attached workbook are compiled from multiple sources with contextual details provided in the footnotes. Due to the evolving nature of risk and ongoing data collection efforts—including for granular customer-level information used by ICE 2.0 as well as expected updates to the ICE 2.0 Calculator—all results should be interpreted with caution.

**ANSWER 001**

Please see attachment “*WMP-Discovery2026-2028\_DR\_SPD\_012-Q001Atch01 (ICE 2.0 Inputs 8.8).xlsx*”.