

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

<b>PG&amp;E Data Request No.:</b>	SPD_014-Q003
<b>PG&amp;E File Name:</b>	WMP-Discovery2026-2028_DR_SPD_014-Q004
<b>Request Date:</b>	September 16, 2025
<b>Requester DR No.:</b>	SPD-PGE-WMP2026-014
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Edwin Schmitt
<b>Date Sent:</b>	September 26, 2025

**SUBJECT: MAPPING WDRM v.3 TO v.4 (SPD-PGE-WMP2026-014)**

**QUESTION 004**

Regarding SPD-PGE-WMP2026-010 Question 2(b) that requests the mapping of v2 to v3 circuit segments, SPD understands that it is PG&E's position that it does not have all the data necessary to automate this mapping process. PG&E has stated to SPD that it would require a manual approach that is different from what PG&E did to complete the mapping of v3 to v4 circuit segments. According to PG&E this manual approach would require additional SME resources.

- a. Clearly explain each step taken to complete the mapping of v3 to v4 circuit segments that was submitted as PG&E's third supplemental response to SPD-PGE-WMP2026-010 Question 2(b).
  - i. What datasets were used to complete each step in Question 4a.
- b. What step(s) from Question 4a. is PG&E unable to complete in the mapping of v2 to v3 CPZs
  - i. What datasets are not available for PG&E to complete the mapping of v2 to v3CPZs.
  - ii. Explain why those datasets do not exist.
  - iii. Explain the steps PG&E is taking to make sure those datasets are available for mapping CPZ across future risk model transitions.
  - iv. What SME resources would be needed to recreate the datasets that are needed to complete the mapping of v2 to v3 CPZs.

**ANSWER 004**

- a. The mapping tool uses several Circuit Segment (CS) attributes to determine how a WDRM v3 CS maps to a WDRM v4 CS, including:
  - CS Name
  - Circuit Feeder Name

- Interrupting Device Global ID
- CS Total Length (Primary & Secondary, Overhead & Underground)
- CS Total Overhead Conductor Length (Primary & Secondary Overhead)
- CS to Conductor Assets assignments.

The mapping tool uses various logical checks on these attributes to determine if a CS is the same in both versions and, if not, what type of change has occurred. For instance, a CS is determined to be the same in both versions if:

- CS Names are identical
- Circuit Feeder Names are identical
- Interrupting Device IDs are identical
- CS Total Length has changed by less than 1%
- All Conductor Asset IDs are identical.

i. The input datasets to the mapping tool are the:

- WDRM v3 Circuit Segment Statistics table
  - circuit\_segment\_statistics\_20220101
- WDRM v3 Circuit Segment to Conductor Mapping
  - 20220101\_conductor\_to\_cs\_mapping
- WDRM v4 Circuit Segment Statistics table
  - circuit\_segment\_statistics\_20230101
- WDRM v4 Circuit Segment to Conductor Mapping
  - all\_assets\_to\_circuit\_segment\_lookup\_snapshot\_2023\_01\_18\_00\_46\_30.parquet

b. The WDRM v2 to WDRM v3 cannot use the mapping tool

i. Data missing for WDRM v2:

- WDRM v2 was built only for CS within HFTD, not the entire service territory like WDRM v3. Any non-HFTD WDRM v3 CS would therefore be classified as new using the tool.
- WDRM v2 was only modeled against primary overhead conductors.
  - No secondary overhead conductor data was collected or archived.
  - No primary or secondary underground data was collected or archived.

ii. WDRM v2 was PG&E's first internal iteration of the WDRM. The model was developed in 2020 for the purpose of guiding the Enhanced Vegetation Management (EVM) and overhead System Hardening mitigation programs to the highest wildfire risk locations in HFTD. The decision to use circuit segments arose during the development process to address limitations in the historical event data and was not understood at that time to be a requirement for future model versions. Thus, the missing data was not required for the

simple single event probability model approach used for producing WDRM v2 risk values. Therefore, the data was not collected at that time.

- iii. All collected CS attribute data used for WDRM v3 and v4 development have been archived. In addition, just prior to WDRM v4 final development began, a process was implemented to collect and archive snapshots of the current CS attribute data on our Foundry platform on the first of each month.
- iv. To create a WDRM v2 to v3 mapping, it is anticipated that much of the mapping work would require manual visual comparison of v2 and v3 (HFTD only) CS primary overhead conductor configurations. A gross comparison could be built to programmatically verify that identical v2 and v3 CS names have the same primary overhead conductor lengths to create an initial list of CS that **most likely** remained the same. All other CS would require a manual visual comparison to determine v3 CS configuration(s) against v2 CS configuration(s). A limited number of these comparisons were performed during WDRM v3 validation and proved to be very time consuming to perform. Given this experience we estimate that a complete WDRM v2 to v3 mapping would consume 2 full-time SMEs for at least 2 to 3 months.