

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

PG&E Data Request No.:	SPD_014-Q001
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_015-Q001
Request Date:	October 6, 2025
Requester DR No.:	SPD-PGE-WMP2026-015
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	November 6, 2025

SUBJECT: WMP COST TRACKER UPDATE (SPD-PGE-WMP2026-015)

QUESTION 001

Provide an update to Data Request SPD_WSPS_PG&E_2024_011 that was submitted to Safety Policy Division on January 10 2025.¹ This would be an update to PGE-WMP Cost Reporting Template 20250110.xlsx. This update to the WMP Cost Reporting Template should represent values associated with the 2023-2025 Base WMP.

- a. Complete tabs 2 through 4 of the attached spreadsheet IOU WMP Cost Reporting and Account Tracking Template 2025_09.xlsx.
- b. For tabs 2 and 4, complete a data row corresponding for each of the utility mitigation tracking IDs in Table 1 of the QDRs, according to the directions in the spreadsheet and the two attached guidance documents listed below:
 - i. Guidance for WMP Cost Reporting 2025.docx (applicable to tabs 2 and 3)
 - ii. Guidance for Account Tracking 2025.docx (applicable to tab 4)
- c. For each entry in Tab 2, 4 entries will automatically populate into Tab 3, which break out the mitigation initiative by HFTD/non-HFTD, CapEx/OpEx expenditures.

ANSWER 001

Please see attachment “WMP-Discovery2026-2028_DR_SPD_015-Q001Atch01.xlsx” for our response to this request.

PG&E’s QDR Table 1 only has numbered initiatives for specific commitments (i.e. AI-02 and GH-05), Using just this population will not tie back to the financials in the QDR Table 11 which has the complete WMP initiative costs.

PG&E’s QDR Table 11 shows some costs at the level of a specific commitment, such as VM-02 or GH-07, while it shows others at the level of an Initiative Activity. Within the

¹ The PG&E File name for this data request is WMP-Discovery2023-2025_DR_SPD_021-Q001Supp06.

latter group, Table 11 shows that some Initiative Activities have associated commitments, while others do not.

In this data request response, PG&E listed each commitment in its own row and for each MAT code the initiative has, and, for those Initiative Activities with no associated commitments, listed each remaining Initiative Activity ('Emergency Preparedness Plan', 'Fire Potential Index') as its own row and by MAT code.

Please note that certain initiatives are not tracked at an HFTD and non-HFTD level. We provide HFTD and non-HFTD allocations of recorded costs for such initiatives by allocating values based on the percentage of our distribution line-miles in HFTD and non-HFTD, respectively.

Please note that we provide recorded cost and unit data for 2023 and 2024 and unit data mostly consistent with our QDR submissions however we did find an error in one initiative for the 2023 amounts of approximately \$15.6 million that we removed from this data set. For 2025 we have provided our Projected amounts.

Regarding "Section A: WMP Cost and Unit Data" In the Expenses tab, please note that we do not provide unit data for unnamed initiatives (e.g. "VM-Emergency response vegetation management," WMP Section 8.2.3.8) because these categories include variously unitized activities or non-unitized activities.

Regarding "Section B Costs and Units Authorized in Last GRC," in the Expenses tab, please note that the 2023 GRC did not provide HFTD and non-HFTD forecasts for many programs, so we are reporting all authorized dollars and units for those programs in Section B in the "HFTD, CapEx" and "HFTD, OpEx" cells of the worksheet.

Regarding "Section C: Costs and Units Forecast to be Requested in the Next GRC" in the Expenses tab, we understand that this section is requesting any 2023-2025 WMP costs requested in the 2027 GRC, which are years prior to the 2027 GRC time period. Please refer to our upcoming response to Question 2 of this data request that will have 2026-2028 WMP projected costs in the 2027 GRC.

Regarding "Section D: Costs Recorded via Application (Memo or Balancing Account)" in the Expenses tab, we understand "Application (Memo or Balancing Account)" to include the following memo or balancing accounts where costs are recorded, including those authorized and funded in the GRC. This population consists of the MicroGrid Memorandum Account (MGMA); MicroGrid Balancing Account (MGBA); Elect Program Invest Charge BA (EPIC); Wildfire Mitigation Plan Memorandum Account (WMPMA)/Fire Risk Mitigation Memorandum Account (FRMMA); Catastrophic Emergency Memorandum Account (CEMA).

Regarding "Section E: EUP" in the Expenses tab, we have not submitted PG&E's Electric Undergrounding Plan. Therefore, there are no forecast units or forecast costs for the EUP Section.

Regarding "Section F: FERC or Other" in the Expenses tab, we understand this to mean costs related to the Transmission Owner case. Please note that certain initiatives (e.g. RM - Risk Methodology and Assessment) include the full 2024 and 2025 WMP forecast amount in this section. Those values do not represent the expected actual allocation of cost to the Transmission Owner case.

Additionally, please note that we did not forecast our work under the Community Outreach and Engagement category by WMP Initiative ID in our 2023 GRC. As such,

we report all GRC forecasts under this category in the section titled “CO-Public outreach and education awareness program.” Further, please note that we have updated our data to re-categorize 2023 recorded costs related to the Community Outreach and Engagement from initiatives, CO-01, CO-02, CO-04 and CO-05 into: CO-Public outreach and education awareness program; CO-Best practice sharing with other utilities; CO-Engagement with access and functional needs populations, and CO-Collaboration on local wildfire mitigation planning. Upon review, we determined that recorded costs for 2023 could not be allocated on an initiative level and were more properly allocated as presented here. Please note that our 2024 and 2025 forecasts remain allocated by numbered initiative, but that these forecasts are inclusive of activities beyond those described in the initiatives.

Further, please note that we did not forecast our work in our 2023 GRC under the Emergency Preparedness category by WMP Initiative ID. As such, we report our GRC forecasts under this category in the sections titled “EP-External Collaboration and Coordination,” and “EP-Emergency Preparedness Plan.” Further, please note that we have updated our data to re-categorize 2023 recorded costs related to Emergency Preparedness into: EP-Customer support in wildfire and PSPS emergencies; EP-Emergency preparedness plan; EP-External collaboration and coordination, and; EP-Public emergency communication strategy. Upon review, we determined that recorded costs for 2023 could not be allocated on an initiative level and were more properly allocated as presented here. Please note that portions of our 2024 and 2025 forecasts remain allocated by numbered initiative, but that these forecasts are inclusive of activities beyond those described in the initiatives.

Some of the initiatives being provided include blank cells for costs in the worksheets. These initiatives have costs; however, the costs are in a Provider Cost Center (PCC) for the WMP objective, and line-item costs are not able to be extracted.

Some initiatives being provided reflect (0) for costs in the worksheets. These initiatives have costs related to the WMP, however, their recorded or forecasted costs are currently \$0.

Regarding the “General Info” tab, PG&E is providing the Risk Spend Efficiency (RSE) from the 2023 GRC application as available, as Cost-Benefit Ratios (CBR)s were not calculated when the 2023 GRC was filed. The Column labeled “Cost requested in original GRC Application (\$000s)” has been completed based on PG&E’s 2023 GRC Reply Brief (December 9, 2022) with the non-labor escalation update. The Column labeled “GRC Activity Section and Page Number” refers to the sections as filed in the 2023 GRC February 25, 2022, update and the page number is as reported in the table of contents for the Exhibit and Chapter for the referenced section. Note that some MAT codes provided in the GRC Activity Unique Code column may apply to multiple WMP initiatives.

PG&E is meeting with SPD on November 7, 2025, to discuss progress and the final deadline for the Account Tracking tab and Question 2 of this data request.