

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

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| PG&E Data Request No.: | TURN_002-Q003 |
| PG&E File Name: | WMP-Discovery2026-2028_DR_TURN_002-Q003 |
| Request Date: | April 7, 2025 |
| Requester DR No.: | TURN-PG&E-2 |
| Requesting Party: | The Utility Reform Network |
| Requester: | Reina L. Yanagiba; A. Mireille Fall-Fry |
| Date Sent: | April 10, 2025 |

SUBJECT: 2026-2028 BASE WMP

QUESTION 003

Section 6.1.2, page 118 states that, instead of undergrounding, “in certain circumstances we may choose to overhead harden a circuit segment or portion of a circuit segment because of feasibility constraints.” Please identify and explain each and every criterion that PG&E would use to determine that feasibility constraints have reached the point that PG&E would choose overhead hardening over undergrounding and how PG&E would decide, based on those criteria, that overhead hardening is the best choice.

Answer 003

PG&E objects to this request as it is overbroad, vague, ambiguous, and unduly burdensome. It is not possible to identify every single criterion that PG&E could use in evaluating the feasibility of a project. Notwithstanding and without waiving this objection, PG&E responds as follows:

The feasibility of installing underground infrastructure can vary significantly across PG&E's service area, and therefore, the specific circumstances and facts must be evaluated for each case. Certain conditions may necessitate overhead hardening instead of undergrounding due to feasibility constraints. These conditions may include, but are not limited to:

- **Culturally Restricted Areas:** Locations where underground installation may not be permitted due to cultural or historical considerations.
- **Geographical Challenges:** Situations such as large water crossings where bridge attachments are not possible or large canyon crossings where no reasonable underground path exists.
- **Legal and Land Use Constraints:** Inability to acquire the necessary easements or rights to install underground infrastructure.

- Geological Conditions: Presence of hard rock or granite terrain, where excavation costs are prohibitively high.

These feasibility constraints are reviewed during the scoping process, and the associated costs are included in mitigation scenario analyses, such as the Cost-Benefit Ratio (CBR). This evaluation may lead to choosing a hybrid solution in some cases.

In other instances, feasibility constraints become apparent later in the project lifecycle. When this occurs, decisions regarding overhead hardening versus undergrounding are made based on financial implications, timing considerations, risk assessment, and constructability challenges. This ensures that the selected approach is the most feasible and effective given the circumstances.