

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

PG&E Data Request No.:	TURN_002-Q004
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Requester DR No.:	TURN-PG&E-2
Requesting Party:	The Utility Reform Network
Requester:	Reina L. Yanagiba; A. Mireille Fall-Fry
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SUBJECT: 2026-2028 BASE WMP

QUESTION 004

Section 6.1.3.1, page 129, states, “While undergrounding is PG&E’s preferred solution for mitigating ignition risk in the highest risk areas, we recognize that undergrounding takes longer to execute than overhead hardening and is a more costly investment in the short term[,]” and “Covered conductor can generally be installed more quickly and costs less than undergrounding, but it does not protect against tree strike risk or fully address the reliability risk[,]” and concludes that “undergrounding, where feasible, is the best alternative where tree strike risk is high.” This conclusion does not address the information provided in Table 6.1.3-1 on page 128. Please explain why the cost and timing of undergrounding, which the table provides has a 98-99% average effectiveness, is preferred to the combination of covered conductor, EPSS, and PSPS, which the table provides has a 97% average effectiveness.

Answer 004

We disagree that this conclusion is not addressed. On page 128, we noted that “[t]he combined use of covered conductor, EPSS, and PSPS introduces a high likelihood of system outage risk and is disruptive to our customers.” As further and more fully described in Section 6.1.3.2 (pg. 134-135) and in PG&E’s 2025 WMP Update, ACI 23-05 (pp. 56-57), PG&E recognizes that overhead hardening can be installed more quickly than an undergrounding solution; however, the initial risk reduction achieved from quicker installation of an overhead mitigation does not compensate for the greater total, more permanent risk reduction achieved over the lifetime of an underground solution. Undergrounding is preferred to the combination of covered conductor, EPSS, and PSPS because it nearly eliminates wildfire risk. We expect undergrounding to also reduce reliability risk and the need to operate and maintain overhead equipment and clearing vegetation around the overhead facilities. PG&E’s intent is to significantly reduce reliability impacts of outage programs and to offer near permanent solutions to the highest risk areas.