

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

PG&E Data Request No.:	SPD_001-Q021Rev01
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_001-Q021Rev01
Request Date:	April 15, 2025
Requester DR No.:	SPD-PGE-WMP2026-001
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	May 7, 2025 Rev01: May 22, 2025

SUBJECT: OUTAGES, PRIORITY A, MITIGATION EFFECTIVENESS AND WBCA (SPD-PGE-WMP2026-001)

QUESTION 021

SPD is attempting to compute the cost per unit for many of the WMP initiatives tracked in the WMP Implementation Dashboard (WMP Implementation Dashboard). Review and confirm the cost per unit is correct for the initiatives. See the attached workbook titled PGE WMP Implementation Dashboard.xlsx.

- a. Follow all of the instructions within the cells and notes included in PGE WMP Implementation Dashboard.xlsx.
- b. SPD is attempting to do a similar exercise for the 2026-2028 WMP but the QDR tabular data was not submitted. SPD saw some of the data in the WMP, but was unable to determine if this data was inclusive of all initiatives. Where should SPD look for equivalent data?

ANSWER 021 Revised 01

- a. Please see attachment "*WMP-Discovery2026-2028_DR_SPD_001-Q021Rev01Atch01.xlsx*" for the requested information.

The values provided in the Excel file section titled "PGE Response" represent PG&E's response to this data request using the formulas and data sources provided by SPD, except to the extent amended as described below, and do not reflect PG&E's official or final calculation of the unit costs associated with the listed WMP initiatives.

Please note, the values in the "PG&E RESPONSE" worksheet are based on SPD's instructions, data, and formulas but with the following amendments, adjustments, and corrections:

- PG&E has updated values in the “Total Cost” column for the year 2024 to reflect final, actual (as opposed to forecasted) costs as reported in our 2024 Annual Report on Compliance (ARC).
- PG&E has updated “Units Planned/Completed” for the year 2024 to reflect final units as reported in our 2023 and 2024 ARCs.
- Initiatives GH-01 (System Hardening) and GH-04 (Undergrounding) do not calculate unit costs using the method proposed by SPD. The following are clarifications about how unit costs are calculated for these projects. These corrections have been incorporated into worksheet “GH-01 & GH-04 Unit Cost” in attachment “WMP-Discovery2026-2028_DR_SPD_001-Q021Rev01Atch01.xlsx”. The 2023 and 2024 unit costs are from historically completed projects. The 2025 unit costs are predominately based on forecasts with a current workplan that contains more miles than targets.

(1) **WMP Reporting Clarifications:** As approved in the 2023 WMP, the GH-01 initiative includes the System Hardening Undergrounding miles, as well as the overhead hardening and line removal work. In Table 11 of the WMP QDR, the undergrounding costs, however, are not reported for GH-01 in order to not double-count those costs reported in GH-04. The System Hardening Undergrounding miles, however, are reported in Table 1 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the miles is not appropriate.¹

Additionally, for WMP reporting, PG&E includes hardening miles from non-System Hardening programs like Work Requested by Others (WRO), Capacity, and Rule 20A. Costs for those projects are not included in the unit cost calculation since they are outside of the base System Hardening program captured in MAT Codes 08W and 3UG.

- (2) **Unit Cost Calculation Method:** Unit cost is calculated using total costs-since-inception (multi-year) and total miles completed (which can be multi-year) of the subprojects that are 100% complete in the associated year. Unit cost is not calculated by dividing the total program cost spent by the total miles completed in a given year because it would:
- (i) Inaccurately include both the readiness/pre-construction costs for future subprojects that are not yet complete and the post-construction/closeout costs for previously completed subprojects, and
 - (ii) Inaccurately include subprojects with partially completed miles at year-end.
- Note, the miles reported in the WMP QDRs and ARCs include the miles that have been energized and completed the final Fire Risk Safety Audit in a particular year, even if the subproject completes work across multiple years (i.e. there could be a portion of the subproject energized work in year 1 – which is reported in the WMP mileage completed – and the project is 100% completed in year 2. The unit cost

¹ Note, in the 2026 WMP, we have removed the system hardening undergrounding miles from GH-01 initiative and renamed to GH-12 to only include overhead hardening and line removal.

will be calculated only in year 2, but the energized miles based on the portion of the project completed will be reported in the relevant year).

- Note, the approach we take for calculating unit cost is consistent with PG&E's response to data request TURN_003-Q004, which was specific to the System Hardening Undergrounding unit cost. The following two additions are captured in worksheet "GH-01 & GH-04 Unit Cost" in attachment "*WMP-Discovery2026-2028_DR_SPD_001-Q021Rev01Atch01.xlsx*" based on the scope of this request being at the WMP initiative-level:
 - **GH-01:** This response includes unit costs separated by the three mitigation types included within GH-01: (1) System Hardening Undergrounding, (2) Overhead hardening, and (3) Line removal. One combined unit cost for the GH-01 initiative is not useful to capture, since it includes multiple hardening mitigation types that are not comparable for unit cost calculations.
 - **GH-04:** This response includes unit cost separated by two sub programs, and PG&E has a combined GH-04 Undergrounding Unit cost included, as well:
 - System Hardening Undergrounding;
 - Community Rebuild Undergrounding.
- Mitigation SA-02 includes both capital and operational expenditures. PG&E has split SA-02 to reflect separate calculations for each of capital and operational expenditures.
- Costs for GM-02 are not separated but included in the Activity level "Vegetation Inspections – Transmission."
- Costs for GM-03 are not separated but included in the Activity level "Vegetation Inspections – Distribution."
- PG&E has determined that a formula error occurred in SPD's calculations for Mitigations VM-03 and VM-04 and provides corrected values in the "PGE_RESPONSE" worksheet.
- Upon consultation with mitigation owners, PG&E has made corrections to the "Total Cost" and, accordingly, "updated Average Cost per Unit" columns for the following mitigations for 2023: AI-02, AI-04, AI-05, AI-06, AI-07, VM-04.
- Upon consultation with mitigation owners, PG&E has made corrections to the "Total Cost" and, accordingly, "updated Average Cost per Unit" columns for the following mitigations for 2023: AI-02, AI-04, AI-05, AI-06, AI-07.
- Upon consultation with mitigation owners, PG&E has made corrections to the "Units Completed" and, accordingly, "Updated Average Cost per Unit" columns for 2023 and 2024 for GM-06.
- With regard to values for 2025, PG&E notes that the values used by SPD reflect forecasts first made in 2022. PG&E has provided updated values reflecting more current forecasts.

b. PG&E's QDR tabular data will be provided with the Q1 2025 QDR in May 2025.