

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

PG&E Data Request No.:	SPD_001-Q026
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_001-Q026
Request Date:	April 15, 2025
Requester DR No.:	SPD-PGE-WMP2026-001
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	April 18, 2025

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

QUESTION 026

The 2026-2028 WMP references the WBCA Tool, but SPD has reviewed other filings like PG&E's 2024 RAMP Application (R.24-05-008) where this tool is not referenced.

- a. The WBCA was not referenced in PG&E's 2024 RAMP Application. During the preparation of PG&E's 2024 RAMP, were any aspects of the WBCA used to determine mitigation effectiveness values and/or mitigation selection and, if so, explain in detail how. If not, explain why not.
 - i. When did PG&E begin developing the WBCA Tool?
- b. List the differences between the way mitigation effectiveness values were calculated when preparing PG&E's 2024 RAMP Application and when preparing the 2026-2028 WMP submission.
 - i. Provide an explanation for each difference listed.
- c. List the differences between the way mitigations were selected for a given asset when preparing PG&E's 2024 RAMP Application and when preparing the 2026-2028 WMP submission.
 - i. Provide an explanation for each difference listed.
- d. In WMP-Discovery2026-2028_DR_TURN_002-Q006, PG&E stated the WBCA tool is still in development in its response to TURN's questions, but pages 187 through 192 of the 2026-2028 WMP appear to present the tool as complete. What portions of the WBCA Tool are still under development?
- e. SPD understands that PG&E has two risk models for its wildfire risk, (1) the EORM and (2) the WDRM/WTRM. How does the WBCA Tool incorporate information from both of these risk models?

Answer 026

- a. The WBCA was not used for any analysis in the 2024 RAMP Application as the WBCA tool was not developed at the time of the 2024 RAMP Application.
 - i. PG&E conceptualized the WBCA in 2023 and began developing the WBCA tool in earnest in 2024 based upon OEIS' Revised EUP Guidelines and described it in the 2023 WMP Revision Notice 23-05. Starting this year, the inputs of PG&E's WBCA are being used to inform the cost-benefit analysis for scoping using the System Hardening Project Scoping Decision Tree and Process (shown in Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3) for work that will be completed in 2027, and included in our Test Year 2027 GRC and our EUP.
- b. The mitigation effectiveness values in the 2026-2028 Base WMP submission are calculated at the circuit segment-level (see Section 8.2.1, p. 187). When analyzing a potential project, the WBCA uses specific effectiveness values for those circuit segments based on the unique risk sub-drivers (outage combinations) for that location, as identified by the WDRM.

The 2024 RAMP Application mitigation effectiveness values were calculated using the system averages for undergrounding work, and sub-driver mitigation effectiveness values for covered conductor. The mitigation effectiveness values in the 2024 RAMP Application are aggregated at the tranche level rather than the circuit segment-level. This was based on analysis available at the time of filing.

- i. The 2026-2028 Base WMP submission uses the most recent mitigation effectiveness analysis that uses a preliminary version of the WBCA tool that was not available at the time of the 2024 RAMP application. In addition, the 2024 RAMP analysis focuses on tranche-level analysis rather than circuit segment analysis.
- c. For the 2024 RAMP Filing, the mitigation selected was based on a filtering of the circuit segments from 1-N based on wildfire risk rank. There was no cost-benefit analysis conducted for the RAMP filing. It was assumed that projects selected for undergrounding had a hybrid split between overhead hardening and undergrounding (90% of a circuit segment was assumed to be undergrounding and 10% of the circuit segment assumed to be overhead hardening). The focus for mitigation selection at the time of the 2024 RAMP filing was risk reduction.

For work planned in 2026, we used the system hardening decision tree presented in PG&E's 2023-2025 Base WMP (Figures SRN-PG&E-23-05-06A, SRN-PG&E-23-05-06B, SRN-PG&E-23-05-06C). It was the starting point for selecting system hardening mitigations for 2026. Additional considerations included the presence of tree strike risk and ingress/egress concerns.

For work planned for completion in 2027, we are using the decision tree (Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3) in the 2026-2028 Base WMP. This updated decision tree includes the Cost Benefit Ratio (CBR) and Net Benefit (NB) criteria as we revise our strategies to meet the requirements of the Electrical Undergrounding Plan (EUP). PG&E anticipates transitioning the undergrounding program to the EUP for 2028 and may need to adapt the project selection approach described in the decision tree outlined above to align with the final EUP guidelines and approval conditions after the EUP is approved and goes into effect.

- d. On pages 187 through 192 of the 2026-2028 WMP PG&E describes how we use the WBCA to calculate wildfire mitigation effectiveness at the circuit segment level.

PG&E used a preliminary version of the WBCA to analyze the allocation of mitigation effectiveness to specific circuit segments, which was used for the 2026-2028 Base WMP submission.

The final WBCA tool that will be used for the purpose of calculating cost-benefit ratios and that will meet the EUP requirements is not complete. The methodology, tool development and input values are being finalized, before quality assurance can be completed. The final version of the WBCA tool will be used for project selection for the 2027 GRC and the upcoming EUP.

- e. The WBCA tool incorporates risk information from both the EORM model and the WDRM model. The EORM model is used to quantify the absolute value of the risk on the circuit segment. The WDRM model portrays the relative risk of a circuit segment across the system and provides a risk ranking for the circuit segments. These models provide key inputs for calculating the risk reduction benefit and cost-benefit ratio calculations of the mitigation alternatives.