

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigations Plans Discovery 2023-2025**  
**Data Response**

<b>PG&amp;E Data Request No.:</b>	SPD_025-Q003
<b>PG&amp;E File Name:</b>	WMP-Discovery2023-2025_DR_SPD_025-Q003
<b>Request Date:</b>	March 6, 2025
<b>Requester DR No.:</b>	SPD_WSPS_PG&E_2025_002
<b>Requesting Party:</b>	Safety Policy Division
<b>Requester:</b>	Henry Sweat
<b>Date Sent:</b>	March 19, 2025

**QUESTION 003**

Submit the data in spreadsheet form (template.xlsx) used to create the v4 Risk buy down curve in FIGURE PG&E-B.1.1-3 from PG&E's 2025 WMP Update per the attached spreadsheet template.

- a. Include the PSPS risk score for each circuit segment
- b. Clarify the difference between the number of Pri OH miles and HFTD miles in Figure PG&E-B.1.1-3, and fill the relevant values in to columns D and E.
- c. SPD should be able to graph columns K and L to get Figure PG&E-B.1.1-3.

**ANSWER 003**

Reference for team: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-wmp-r0-update-040224.pdf#page=23>

Please see "*WMP-Discovery2023-2025\_DR\_SPD\_025-Q003Atch01.xlsx*." Please note that FIGURE PG&E-B.1.1-3 in our 2025 WMP Update was created as a risk buydown curve for HFTD Circuit Segments (CS) only, and that the graphic required a custom CS ranking that differs from the WDRM v4 System Hardening CS risk rankings. Specifically, generation of Figure PG&E-B.1.1-3 required the removal of several HFRA-only CS that have high enough risk values to be interspersed among the top-ranked System Hardening CS. Therefore, only HFTD CS are included in "*WMP-Discovery2023-2025\_DR\_SPD\_025-Q003Atch01.xlsx*" so that columns K and L would provide the correct data to recreate FIGURE PG&E-B.1.1-3.

- a. Please see "*WMP-Discovery2023-2025\_DR\_SPD\_025-Q003Atch01.xlsx*." Please note that "PSPS Risk per PriOH Mile" is not a metric we use in the ordinary course of business. PSPS risk is not assessed on a per-mile basis, but is influenced by the type and quantity of downstream customers impacted by a PSPS outage, regardless of the length of conductor supplying those customers.

Please note that the "Wildfire Risk" and "PSPS Risk" metrics (columns F, G, I, and J) are not additive as the results are produced to different scales. The WDRM v4 produces relative CS risk values, but not absolute risk values. The PSPS risk model,

however, is calibrated to produce absolute risk values that match the PG&E Enterprise Risk Model.

- b. Primary Overhead Miles represents CS primary overhead conductor miles for the complete CS, including both HFTD and non-HFTD miles.

HFTD Overhead Miles represents the total primary and secondary overhead conductor miles within HFTD for a CS.

- c. The FIGURE PG&E-B.1.1-3 data have been provided in Columns K and L as requested.

Column K, for the x-axis, is the CS HFTD (only) risk rank based on the CS Wildfire Risk per Primary Overhead Mile.

Column L, for the y-axis is the remaining percentage of HFTD Wildfire Risk for all HFTD CS after removing the CS Wildfire Risk Total (Column F). The sum of HFTD Wildfire Risk used as the basis for calculating percentages is 963.539.

The graphic notes 2 intersection points, which can be verified within the table of data provided.

Total HFTD risk:	67%
Circuit Segments:	941
Primary Ovhd Miles:	9,668
HFTD Miles:	10,001

Row 943, GRAYS FLAT 0401904916, is the point at which 10,000 miles of HFTD have been accounted for in the buydown curve.

Total HFTD risk:	80%
Circuit Segments:	1,432
Primary Ovhd Miles:	14,410
HFTD Miles:	14,626

Row 1,434, ELK CREEK 11012004, is the point at which 80% of the summed HFTD risk has been accounted for in the buydown curve.