Pacific Gas and Electric Company®

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BY ELECTRONIC COMMUNICATION

Office of Energy Infrastructure Safety (Energy Safety)
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: PG&E's Electrical Undergrounding Plan (EUP) Docket No. EUP-PGE, Consolidated EUP Incorporating Errata

Energy Safety:

As requested by the Office of Energy Infrastructure Safety on November 4, 2026, Pacific Gas and Electric Company (PG&E) hereby submits a complete, updated version of its 10-Year Electrical Undergrounding Plan (EUP) that consolidates the errata PG&E submitted to the EUP Docket on October 12, October 30, and November 2, 2026.

The consolidated EUP identifies all changes from PG&E's original EUP submission, so stakeholders and Energy Safety staff can review the current version of the plan with the errata.

PG&E is providing both redline and clean versions of Volumes 1 and 2 of the EUP. The redline and clean version of the consolidated EUP reflects updates to file names of attachments referenced in the EUP. To maintain consistency with stakeholder comments already filed, PG&E has preserved the original pagination of the EUP. Where a correction required additional pages, PG&E inserted supplemental pages using lettered page numbers (e.g., 250A, 250B) so that each affected page can be traced back to the corresponding page in the original submission.

Table 1 below includes an index of revisions, each of which is marked in the redline versions of the EUP.

Table 1. Index of Revisions to the EUP

#	Page	EUP location	Description of change	Errata type	Submitted
1	4	Vol. 1, Ch. 1, Sec. B, FN 7	Corrected page number in footnote 7.	**Non-substantive**	N/A
2	4	Vol. 1, Ch. 1, Sec. B, FN 8	Corrected page number in footnote 8.	**Non-substantive**	N/A
3	17	Vol. 1, Ch. 1, Sec. D.3, FN 29	Corrected page number in footnote 29.	**Non-substantive**	10/12/26
4	17	Vol. 1, Ch. 1, Sec. D.3, FN 32	Corrected page number in footnote 32.	**Non-substantive**	10/12/26
5	17	Vol. 1, Ch. 1, Sec. D.3	Corrected the number of counties from 15 to 13 to align with associated Workpaper 005.	**Non-substantive**	10/12/26
6	18	Vol. 1, Ch. 1, Sec. D.3, Figure 1-2	Replaced Figure 1-2 to align with associated Workpaper 005.	**Non-substantive**	10/12/26

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7	18	Vol. 1, Ch. 1, Sec. D.3, note under map	Corrected page number in note under Figure 1-2 map.	**Non-substantive**	10/12/26
8	19	Vol. 1, Ch. 1, Sec. D.3, note under map	Corrected page number in note under Figure 1-3 map.	**Non-substantive**	10/12/26
9	20	Vol. 1, Ch. 1, Sec. D.4, FN 33	Corrected page number in footnote 33.	**Non-substantive**	10/12/26
10	20	Vol. 1, Ch. 1, Sec. D.4, FN 34	Corrected page number in footnote 34.	**Non-substantive**	10/12/26
11	21	Vol. 1, Ch. 1, Sec. D.5, FN 36	Corrected page number in footnote 36.	**Non-substantive**	10/12/26
12	26	Vol. 1, Ch. 1, Sec. D.9	Added a missing word.	**Non-substantive**	10/12/26
13	26	Vol. 1, Ch. 1, Sec. D.9, FN 49	Corrected page numbering in footnote 49.	**Non-substantive**	10/12/26
14	56	Vol. 1, Ch. 2, Sec. D.1.a.3	Made minor corrections to formulas on lines 1 and 21.	**Non-substantive**	10/12/26
15	74; 411-412; 429; 455-456; 484; 486; 506	Vol. 1, Ch. 2, Table 2-12; Ch. 9 PCS-4/PCS-5; Vol. 2, Att. A, Table A-2; Att. A-1; Att. A-2 Tables C.12/C.15; WP002; Att. A-4 Model Risk Landscape	Incorporated inflationary adjustments into monetized instantaneous and cumulative risk values across the applicable tables and data products.	**Substantive**	10/12/26
16	74; 429; 506	Vol. 1, Ch. 2, Table 2-12; Vol. 2, Att. A, Table A-2; WP002	Revised Target/Timeline Table endnote (d) to clarify risk reduction, distinguish Year 10 instantaneous from 55-year cumulative values, and clarify inflation and climate adjustments.	**Substantive**	10/30/26
17	99	Vol. 1, Ch. 3, Sec. D.1.a.2	Clarified that of 844 identified Fire Rebuild Circuit Segments, 581 are located within the HFTD.	**Substantive**	10/30/26
18	136	Vol. 1, Ch. 3, Screen 3, Project Risk Analysis	Corrected 'ACEE' to 'Association for the Advancement of Cost Engineering'	**Non-substantive**	10/30/26
19	209	Vol. 1, Ch. 5, Sec. C.3.c	Corrected outdated unit-cost assumptions, reducing savings from $220,000 to $150,000 per mile and corresponding 10-year savings from $746 million to $496 million.	**Substantive**	10/12/26
20	317	Vol. 1, Ch. 7, Core Capability 4, Sec. G.4.c	Added EPSS to clarify that the Fire Weather Index multiplier is applied to Wildfire, EPSS, and PSPS risks.	**Non-substantive**	10/30/26
21	350	Vol. 1, Ch. 7, Project Variable Modifiers	Corrected subdriver mitigation-effectiveness values from 98% to 95% and 71% to 25% to align with Table PCS-6.	**Non-substantive**	10/30/26
22	397	Vol. 1, Ch. 9, Table 9-3, line 1	Revised field name to 'Scaled Wildfire Risk post-PSPS and post-EPSS,' adding post-EPSS.	**Non-substantive**	10/30/26
23	411-412; 455-456	Vol. 1, Ch. 9, Tables PCS-4/PCS-5; Vol. 2, Att. A-1	Corrected climate and inflation treatment for ignition consequence, ignition likelihood, outage consequence, and outage likelihood.	**Substantive**	10/30/26
24	411-412; 455-456	Vol. 1, Ch. 9, Table PCS-5; Vol. 2, Att. A-1	Updated risk and likelihood KDMM values beginning in Year 1 to cumulative rather than incremental annual values because Year 0 had inadvertently been omitted.	**Substantive**	10/30/26
25	484	Vol. 2, Att. A-2, Table C.8	Corrected circuit ID from 'SMUD 1580' to 'SMUD 15805.'	**Non-substantive**	10/12/26

#	Page	EUP location	Description of change	Errata type	Submitted
26	484	Vol. 2, Att. A-2, Table C.12	Corrected mean ignition consequence for inflation and climate escalation and mean outage-program likelihood for climate escalation; also applied the Year 0 correction.	**Substantive**	11/2/26
27	484	Vol. 2, Att. A-2, Table C.14	Supplemented justification for overlapping project geometry and assets outside Confirmed Project Polylines.	**Substantive**	10/12/26
28	484	Vol. 2, Att. A-2, Tables C.12 and C.15	Corrected Year 0 cumulative risk values because they did not represent pre-mitigated risks presented in the Model Risk Landscape JSON and CSV.	**Substantive**	11/2/26
29	484	Vol. 2, Att. A-2, Table C.23	Removed erroneous duplicate record for subproject Proj00028-3UG-UGAS.	**Non-substantive**	10/30/26
30	486	Vol. 2, Att. A-4, JSON Model Risk Landscape	Corrected Year 0 to show unmitigated risk and aligned likelihood and consequence values with corrected PCS-4/PCS-5 methodology.	**Substantive**	10/30/26
31	527	Vol. 2, Att. B, WP005	Updated one reference from Wildfire Model V11 to V12.	**Non-substantive**	10/30/26
32	564	Vol. 2, Att. B, WP006	Corrected O&M present-value formula exponent from t to t-1 so first-year costs are undiscounted and subsequent years appropriately discounted.	**Non-substantive**	10/30/26
33	893	Vol. 2, Att. B, WP018, Sec. 3.5	Removed language incorrectly indicating that EUP outage likelihood reflected the full likelihood of an EPSS outage rather than incremental risk. No reported values or other narrative content were affected.	**Substantive**	11/2/26
34	1186	Vol. 2, Att. C, Glossary, Risk Density	Added clarification to the definition of Risk Density.	**Non-substantive**	10/30/26
35	1189	Vol. 2, Att. D, SPD-37 Tables 1 and 7	Updated incremental O&M values to include benefits associated with removal of idle miles where applicable; reconciled Table 1 and updated related annual-cost fields in Table 7.	**Substantive**	11/2/26
36	1190	Vol. 2, Att. D, SPD-37 Table 1	Corrected societal discount rate from -0.27% to 2.0% because the 2.0% rate was already expressed as a real rate and should not have received another inflation adjustment.	**Substantive**	10/30/26
37	1190	Vol. 2, Att. D, SPD-37 Table 1	Updated residential and non-residential customer counts following refresh using full project-scoping geometry.	**Substantive**	10/12/26
38	1238	Vol. 2, Att. D, SPD-37 Table 7	Updated annual O&M costs and savings to nominal dollars by incorporating inflation over asset life and corrected overhead-hardening expected useful life from 55 to 48 years.	**Substantive**	10/12/26

Sincerely,

/s/ Justin Sadler

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