

PACIFIC GAS AND ELECTRIC COMPANY
10-Year Electrical Undergrounding Plan (EUP)
Data Response

PG&E Data Request No.:	MGRA_002-Q003
PG&E File Name:	EUP-PhI_DR_MGRA_002-Q003
Request Date:	October 12, 2026
Requester DR No.:	002
Requesting Party:	Mussey Grade Road Alliance
Requester:	Joseph Mitchell
Date Sent:	October 15, 2026
PG&E Witness(es):	Justin Sadler

QUESTION 003

In PG&E's Project Variable Modifier (PVM) analysis (p. 350), SME's assessed the effectiveness of mitigation alternatives against 2,700 failure modes that occurred in the HFTD.

- a. Does this failure mode analysis include damage caused during PSPS events that were detected during post-PSPS patrols?
- b. If "no", how otherwise does PG&E incorporate damage that is induced by high winds?

ANSWER 003

- a. No, the mitigation effectiveness analysis that informs the Project Variable Modifiers (PVMs) is based on sustained outage events from 2015 through 2024 and the documented causes associated with those events. Company-initiated outages, including Public Safety Power Shutoff (PSPS) events, are not incorporated into the PVM mitigation effectiveness values.
- b. Damage associated with high winds is incorporated into the mitigation effectiveness analysis when it results in a documented failure event captured in the historical outage dataset and attributed to a recorded cause or supplemental cause. As such, many wind-related failures are reflected in the effectiveness calculations through outage events that occurred under normal operating conditions. However, damage identified during post-PSPS patrols that did not result in a sustained outage event is not separately included in the PVM mitigation effectiveness analysis.