

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

PG&E Data Request No.:	MGRA_002-Q004
PG&E File Name:	EUP-PhI_DR_MGRA_002-Q004
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):	Andrea Brown, Justin Sadler

Mitigation Effectiveness Analysis

QUESTION 004

PG&E's Tail Risk Project-Level Standard states that in order for a project to demonstrate substantial Wildfire Risk reduction of at least 90%.

- a. What is the origin of the 90% threshold?
- b. Is this 90% threshold in comparison to completely unmitigated, or with respect to existing mitigations in place (i.e. EPSS and PSPS)?

ANSWER 004

- a. The EUP Guidelines, Section 2.7.9.2, Project-Level Standards, Subsection (c), Tail Risk Project-Level Standard, states that the *"Tail Risk Project-Level Standard is the minimum decrease in wildfire likelihood that any Undergrounding Project considered under the Ignition Tail Risk Threshold must achieve to meet the required substantial reduction of the risk of wildfire."*

As described in PG&E's EUP, Chapter 6: Model Report, Section M, Project-Level Thresholds and Standards, 2(c), Tail Risk Project-Level Standard: *"PG&E selected 90 percent as a conservative Standard to distinguish substantial mitigation from incremental improvement. Under this Standard, a Project must reduce at least 90 percent of pre-mitigation Ignition Likelihood or Outage Program Likelihood, leaving no more than 10 percent of the original likelihood remaining. PG&E considers this requires the Project to materially reduce the underlying ignition likelihood, rather than merely produce a marginal or measurable change"*.

- b. The Ignition Tail Risk Project-Level Standard uses a Wildfire Likelihood baseline that is already mitigated by Enhanced Powerline Safety Settings (EPSS) and Public Safety Power Shutoff (PSPS) as the basis for determining whether the standard is satisfied. Specifically, satisfaction of the 90% Ignition Tail Risk Project-Level Standard requires a 90% reduction relative to this already operationally mitigated Wildfire Likelihood baseline.