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

PG&E Data Request No.:	MGRA_003-Q004
PG&E File Name:	EUP-PhI_DR_MGRA_003-Q004
Request Date:	October 19, 2026
Requester DR No.:	003
Requesting Party:	Mussey Grade Road Alliance
Requester:	Joseph Mitchell
Date Sent:	October 22, 2026
Responsible Person(s):	Andrea Brown

Subject: Risk Model

QUESTION 004

PG&E's Risk Model Change Factor Calculation (pp. 55-57) shows that there is 20% more calculated risk per mile with WDRM v3 than there is with WDRM v4. However, overall risk is increased by 30% through inclusion of PG&E's suppression and ingress/egress submodules.

a. How does PG&E reconcile these two values?

ANSWER 004

The two percentages are not directly comparable. PG&E's Risk Model Change Factor measures the change in risk density for the proposed EUP portfolio. MGRA's approximately 30% figure compares aggregate modeled risk between WDRM v3 and v4. Because WDRM produces relative, rather than absolute, risk values, comparisons between versions are meaningful only when calibrated to Bow Tie risk. Any increase or decrease in total system risk is therefore determined by the Bow Tie system risk evaluation, not aggregate WDRM risk.

Additionally, WDRM v4 introduced multiple substantive enhancements, including improved historical fire data, 24-hour simulations, Terrain Difficulty Index, and public egress and wildfire suppression adjustments. Collectively, these enhancements altered the relative geographic distribution of modeled risk and produced a flatter risk profile. As a result, the proposed EUP portfolio can have lower relative risk per mile under WDRM v4 than under WDRM v3.