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

PG&E Data Request No.:	MGRA_004-Q001
PG&E File Name:	EUP-Phl_DR_MGRA_004-Q001
Request Date:	October 20, 2026
Requester DR No.:	004
Requesting Party:	Mussey Grade Road Alliance
Requester:	Joseph Mitchell
Date Sent:	October 23, 2026
Responsible Person(s):	Justin Sadler

Subject: Risk Model

QUESTION 001

PG&E in various places and for various purposes uses both scaled and unscaled wildfire risk calculation. In Table 9-3, p. 397, PG&E indicates that Scaled Wildfire Risk post-PSPS is a precursor to the BCR metric:

TABLE 9-3:
MODEL RISK LANDSCAPE VARIABLES TABLE

Line No.	Field Name	Type	Addresses	Resolution	Is KDMM?	Precursor to Metric(s)
1	Scaled Wildfire Risk post-PSPS	Risk	Ignition Risk	Per Circuit Segment	No	BCR
2	Scaled PSPS Risk	Risk	PSPS Risk	Per Circuit Segment	No	BCR
3	PCEEE Risk	Risk	PCEEE Risk	Per Circuit Segment	No	BCR

a. In the rest of the document and supplemental files, please identify all instances for which "BCR" or "Benefit-Cost Ratio" implies the use of scaled wildfire risk in the benefit calculation, and for which "BCR" or "Benefit-Cost Ratio" implies the use of unscaled wildfire risk, unless the title of the variable or section already specifies whether the BCR uses scaled or unscaled benefit values.

b. If there are tables in which a BCR is presented that depends on scaled wildfire risk, please present an alternative table where columns are added presenting unscaled wildfire risk.

ANSWER 001

a. The BCRs calculated in the EUP and supporting workpapers use Scaled Wildfire Risk post-PSPS and post-EPSS, consistent with Table 9-3 (Model Risk Landscape Variables).

The SPD-37 Appendix 1 Data Submission (Attachment D) separately reports scaled and unscaled BCR values in fields identified as benefit_cost_ratio_scaled and benefit_cost_ratio_unscaled.

b. Unscaled BCRs are provided in PG&E's SPD-37 Appendix 1 Data Submission (Attachment D, SPD-37 Data Table 1), alongside the scaled BCRs, for each project and comparison type. These can be matched to the applicable project-level information in Tables C.11, C.13, and C.15 using the Project ID.