

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

PG&E Data Request No.:	OEIS_001-Q003
PG&E File Name:	EUP-PhI_DR_OEIS_001-Q003
Request Date:	October 7, 2026
Requester DR No.:	Energy Safety-DR-EUP-26-06
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Adam Berlinerman
Date Sent:	October 12, 2026
PG&E Responsible Person(s):	Justin Sadler

QUESTION 003

Circuit Segment Length

- a. Define the denominator in the overall utility risk density per mile used to evaluate the High-Risk Threshold in the EUP as 'program length'. Describe PG&E 'Process for computing this length as well as the OUR density. This description should include how PG&E accounts for previously undergrounded lines, lines with covered conductor installed on them, the treatment of HFTD miles, the treatment of HFRA miles and the treatment of rebuild areas both in and out of the HFTD/HFRA.
- b. Provide a table with the following information for each segment submitted in Table 6 of the EUP. The goal of the table is to understand how the 'program length' (i.e. the denominator of the OUR density calculation) is computed. If more columns are necessary to compute 'program length', append them to the end of the table and define them in your response to the above question.

Column Name	Field Description	Data Type	Notes
circuit_segment_id	A unique value identifying the Circuit Segment ID.	NVARCHAR(255)	Must match the IDs submitted in Table 6 of the EUP
circuit_id	A unique value identifying the circuit.	NVARCHAR(255)	Must match the IDs submitted in Table 6 of the EUP
circuit_segment_length	The length of the entire Circuit Segment, in miles. This should match the values already submitted in Table 6.	REAL	Primary Only
hftd_length	The length of the Circuit Segment in HFTD Tier 2/3	REAL	Primary Only
hfra_only_length	The length of the Circuit Segment in HFRA not included in the HFTD	REAL	Primary Only
rebuild_length	The length of the circuit Segment in designated Rebuild Areas	REAL	Primary Only
program_length	Length used to evaluate risk per mile for High-Risk eligibility	REAL	Primary Only
eligible_construction_length	Overhead length eligible for consideration in the EUP	REAL	Primary Only
overall_utility_risk	Overall Utility Risk on the segment	REAL	Not attitude adjusted
our_density	Measurement of OUR Risk per mile used to evaluate High-Risk eligibility	REAL	Not attitude adjusted
additional_column(1)	To be provided if necessary		
additional_column(2)	To be provided if necessary		
etc.	To be provided if necessary		

ANSWER 003

- a. For non-Fire Rebuild Projects, the denominator of the Overall Utility Risk (OUR) density metric is the total HFTD/HFRA union primary overhead conductor mileage associated with the project. This mileage is calculated as the sum of [hftd_only_circuit_segment_length] and [hfra_only_circuit_segment_length] reported in EUP Table C.6. HFTD and HFRA miles are treated equally and are both included in the HFTD/HFRA union primary overhead conductor mileage. The HFTD and HFRA mileage components are mutually exclusive, with HFRA mileage representing HFRA areas outside the HFTD, and therefore may be summed without double counting. No weighting or preferential treatment is applied to HFTD or HFRA miles. The OUR density per mile is calculated by dividing the applicable OUR value by this mileage.

For purposes of Screen 1, no distinction is made between overhead conductor that may have been previously hardened through undergrounding or covered conductor installation. During detailed project scoping (Screen 3), previously hardened miles are removed from the candidate project scope. However, because OUR is allocated proportionally across a circuit segment, the removal of previously hardened miles does not materially affect the calculated OUR density.

For Fire Rebuild Projects, the denominator is the project's total primary overhead conductor mileage, including primary overhead conductor miles both inside and

outside of HFTD and HFRA areas. This mileage is represented by [circuit_segment_length] in EUP Table C.6. Because Fire Rebuild Projects are sometimes located outside HFTD and HFRA areas, the HFTD/HFRA-specific mileage fields are not used. The OUR density per mile is calculated by dividing the applicable OUR value by [circuit_segment_length]. This treatment captures the full project mileage because Fire Rebuild Projects may include primary overhead conductor located outside the HFTD/HFRA union. Note, there are not circuit segment with Fire Rebuild Projects included.

- b. Please refer to attachment “*EUP-Phi_DR_OEIS_001-Q003Atch01.xlsx*” for the requested table. The attachment is based on data available at Screen 2, before detailed project scoping. The attachment calculates program_length as the sum of hftd_length and hfra_only_length. Data field program_length and eligible_construction_length are equivalent values. No additional columns were added because the provided fields are sufficient to reproduce the program-length calculation.

For purposes of the attachment:

- hftd_length represents primary overhead conductor mileage within the HFTD;
- hfra_only_length represents primary overhead conductor mileage within the HFRA but outside the HFTD;
- program_length represents the denominator used to calculate OUR density;
- eligible_construction_length is equivalent to program_length; and
- our_density equals overall_utility_risk divided by program_length.