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

PG&E Data Request No.:	OEIS_005-Q001
PG&E File Name:	EUP-PhI_DR_OEIS_005-Q001
Request Date:	October 30, 2026
Requester DR No.:	Energy Safety-DR-EUP-26-10
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Niamh Murphy
Date Sent:	November 4, 2026
Responsible Person(s):	Justin Sadler, Nick Noyer

SUBJECT: WILDFIRE REBUILD AREAS – WILDFIRE REBUILD AREA ELIGIBILITY

QUESTION 001

a. Please explain how Circuit Segment VALLEJO B 11017410 was deemed ineligible in Table 6. This Circuit Segment is marked as falling within a Wildfire Rebuild Area. It also has an OUR per mile of 0.124 (since HFTD and HFRA miles equal zero for this Circuit Segment, circuit_segment_length was used to calculate OUR per mile), which is above the High-Risk Threshold of 0.029.

b. If there are other Circuit Segments with similar errors to VALLEJO B 11017410, please provide them in a list.

ANSWER 001

a. VALLEJO B 11017410 was identified as ineligible in Table C.6 because the Circuit Segment had already been rebuilt at the time the table was prepared, leaving no remaining Fire Rebuild work eligible for undergrounding.

   As described in Chapter 3, Screen 1 considers Circuit Segments located in either Tier 2 or Tier 3 HFTD or a Fire Rebuild Area to be In-Area Circuit Segments potentially eligible for the EUP. Eligibility is then evaluated against the three Project-Level Thresholds, including the High-Risk Threshold.

   For purposes of the High-Risk Threshold, Chapter 7 further specifies that for Fire Rebuild Circuit Segments located outside the HFRA/HFTD, we normalize using the full Circuit Segment length rather than HFRA/HFTD mileage. Therefore, because VALLEJO B 11017410 is identified as being within a Fire Rebuild Area and its Overall Utility Risk per mile, calculated using the full Circuit Segment length, is 0.124 million dollars per mile, it exceeds the High-Risk Threshold of approximately 0.029 million dollars per primary overhead mile.

   However, satisfying the High-Risk Threshold does not by itself establish that there is an eligible Undergrounding Project. Because the damaged infrastructure on VALLEJO B 11017410 had already been rebuilt, there was no remaining Fire Rebuild work to underground, which aligns with the EUP Guidelines in Section

2.4.3.1 which states “Only Circuit Segments that have been damaged by wildfire and have not previously been rebuilt are eligible.” PG&E estimates that the Fire Rebuild Circuit Segments identified as ineligible in Table C.6 will be rebuilt before the EUP implementation period begins on January 1, 2028 and therefore, are not eligible for inclusion as EUP Undergrounding Projects.

b. There are 263 Circuit Segments that, like VALLEJO B 11017410, are identified as being in a Fire Rebuild Area but have no HFTD mileage (see EUP, Vol 1., Table 3-3). As described in subpart (a) above, PG&E believes that the Fire Rebuild Circuit Segments identified as ineligible in Table C.6 will be rebuilt before the EUP implementation period begins on January 1, 2028 and therefore, are not eligible for inclusion as EUP Undergrounding Projects Please see “*EUP-PhI_DR_OEIS_005-Q001Atch01.xlsx*” for the requested list of Circuit Segments.