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

PG&E Data Request No.:	TURN_001-Q009
PG&E File Name:	EUP-PhI_DR_TURN_001-Q009
Request Date:	October 19, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	A Mireille Fall
Date Sent:	October 22, 2026
Responsible Person(s):	Yumi Oum

Subject: EUP-PGE

QUESTION 009

PG&E's EUP Vol 1 at pp. 355-356 states

> PG&E evaluated industry benchmarks to determine acceptable risk. We reviewed data from the Federal Energy Regulatory Commission, the Department of Defense, the Nuclear Regulatory Commission, and the United Kingdom's Health and Safety Executive. We chose an individual risk acceptance of 0.5 x 10-6 fatalities per year defined as an acceptable risk for an average individual in the vicinity of a nuclear power plant. The individual risk acceptance criterion was converted to an acceptance loss exceedance curve, which was then used to identify the minimum number of Circuit Segments that are required for mitigation at the system level, if they were prioritized by wildfire risk per mile, to reach an acceptable level of risk in the HFTD/HFRA (in aggregate).
>
> PG&E then draws a risk buy-down curve plotting each Circuit Segment, with overall utility risk per mile on the y-axis and wildfire risk per mile rank on the x-axis. The High-Risk Threshold is then set to the lowest Overall Utility Risk value per mile within the number of Circuit Segments that are required for mitigation.

a. Please provide this analysis in Excel with all supporting data, workpapers, and assumptions.
b. In Excel, if not provided, please provide a list of all circuit segments in WDRMv4 with ID and calculate the risk threshold metric. Please include all data and calculations and indicate which circuit segments are eligible per this screen.
c. Please explain why the individual risk acceptance for a nuclear power plant is the relevant threshold for undergrounding projects in the EUP.

ANSWER 009

a. This analysis in Excel with all supporting data, workpapers, and assumptions are provided in the attachment *"EUP-PhI_DR_TURN_001-Q009Atch01.xlsx"*.

b. A list of all circuit segments in WDRMv4 indicating which circuit segments are eligible per this screen are provided in the attachment *"EUP-PhI_DR_TURN_001-Q009Atch.xlsx", tab "3. All_CS"*.

c. The primary objective of undergrounding under PG&E's Electric Undergrounding Plan (EUP) is to protect public safety by reducing the risk of catastrophic utility-caused wildfires.

   California has not adopted a wildfire-specific risk tolerance criterion. PG&E therefore based its criterion on an established federal benchmark for catastrophic safety risk: the U.S. Nuclear Regulatory Commission (NRC) Safety Goal Policy Statement (51 Fed. Reg. 28044, August 4, 1986). Under that goal, the risk to an average individual in the vicinity of a nuclear power plant of prompt fatalities that might result from reactor accidents should not exceed 0.1 percent of the sum of fatality risks resulting from other accidents to which the members of the U.S. population are generally exposed. This corresponds to about 0.5×10^{-6} fatalities per person per year, and PG&E uses that value as its individual risk acceptance criterion.

   PG&E does not suggest that wildfire hazards are physically comparable to nuclear accidents. The NRC criterion is relevant to consider for wildfire risk for the following reasons.

   1. It also addresses the public safety risk imposed on members of the public who live near infrastructure operated by a regulated utility. The NRC developed its safety goals to answer how safe such facilities must be for the surrounding public. That is the same question the High Risk Threshold must answer for utility-caused wildfire.
   2. It uses the same measure of consequences. The NRC goal addresses fatalities from accidents, which are similar to wildfire fatalities.
   3. The NRC goal is defined for the average individual in the vicinity of the facility. PG&E applied in the EUP this criterion to the average individual exposed to wildfire in the High Fire Threat District and High Fire Risk Area (HFTD/HFRA).
   4. It is well-established, well-researched and stable. The NRC safety goal was adopted through a regulatory process and has been successfully used in U.S. regulatory decision-making for nearly four decades. In the absence of other wildfire-specific risk thresholds, PG&E believes that this is the best benchmark that is available now that can be used in the EUP.