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

PG&E Data Request No.:	TURN_002-Q006
PG&E File Name:	EUP-PhI_DR_TURN_002-Q006
Request Date:	October 20, 2026
Requester DR No.:	002
Requesting Party:	The Utility Reform Network
Requester:	A Mireille Fall
Date Sent:	October 23, 2026
Responsible Person(s):	Justin Sadler; Yumi Oum

QUESTION 006

Refer to Table 1-2 in PG&E EUP Vol 1 on p. 15. Please explain and provide supporting calculations in Excel format with all native formulas intact for the scaling of wildfire risk from $4.5 to $104.9 B.

a. Please explain and provide supporting calculations in Excel format with all native formulas intact for the ~1.44 scaling factor of PSPS from $4.3 to $6.2 B.

b. Explain why EPSS risk remains $6.3 B in the two scenarios presented.

ANSWER 006

Please see the *"TURN_002_Q006" tab in "EUP-PhI_DR_TURN_002-Q006_Atch01.xlsx"* for the supporting calculations underlying the $4.5 billion and $104.9 billion wildfire risk reduction values. As described in Section 1.3 of PG&E EUP Volume 1, the $4.5 billion value reflects wildfire risk reduction without risk-averse scaling and includes wildfire, EPSS, and PSPS risk within the baseline. In contrast, the $104.9 billion value reflects wildfire risk reduction with risk-averse scaling applied and excludes EPSS and PSPS risk from the baseline.

Accordingly, the $104.9 billion value cannot be derived by simply applying the wildfire risk-aversion scalar to the $4.5 billion value. The two values are based on different underlying risk baselines. The $4.5 billion value includes EPSS and PSPS mitigations in the baseline, while the $104.9 billion value is based solely on wildfire risk and does not include EPSS or PSPS mitigations in the baseline. As a result, the difference between the two values reflects both the application of risk-averse scaling and the use of different baseline risk compositions.

a. Please see "TURN_002_Q006a" tab of *"EUP-PhI_DR_TURN_002-Q006_Atch01.xlsx"* for the supporting calculations to demonstrate the application of the PSPS risk-averse scaling factor.

b. Please see "TURN_002_Q006b" tab for EPSS. EPSS risk remains $6.3 billion in both scenarios because EPSS event consequence does not typically exceed the

threshold for the severe consequence (Region 2) as defined in the PG&E's risk-averse scaling function.