

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response**

PG&E Data Request No.:	TURN_007-Q003		
PG&E File Name:	WMP-Discovery2023_DR_TURN_007-Q003		
Request Date:	April 21, 2023	Requester DR No.:	TURN-PG&E- 7
Date Sent:	April 27, 2023	Requesting Party:	The Utility Reform Network
DRU Index #:		Requester:	Tom Long

SUBJECT: SYSTEM HARDENING

QUESTION 003

Regarding the System Hardening Workplan provided as Attachment 1 to the response to TURN data request 2-2 (which in turn asked for a response provided to Cal Advocates):

- a. The first tab in this Excel workbook is named “SH Workplan_2023-2026_Conf”, which suggests that this response to Cal Advocates was taken from a document that also included the years 2025 and 2026. Please provide the most up-to-date version of this workbook for the period 2023-2026. Indicate the date of the information in the workbook that is provided.
- b. It appears that some of the circuit segments listed as high risk in Table 7-2 of the WMP and in the 2023-2026 Undergrounding Work Plan referenced on page 910 of the WMP (R1), e.g., Indian Flat 1104CB and Bonnie Nook 1101CB (only Bonnie Nook 1102CB is shown), are not listed in this workbook. Please explain why this is the case, even though this workbook includes planned undergrounding miles.
- c. Are there discrepancies in the names of the circuit segments between this workbook, and Table 7-2 and the 2023-2026 Undergrounding Work Plan referenced on page 910 of the WMP (R1). If so, please modify the version of this workbook provided in response to “a” to make the circuit segment names consistent with Table 7-2 and the 2023-2026 Undergrounding Work Plan referenced on page 910 of the WMP (R1).

ANSWER 003

The confidential attachment is being provided pursuant to a signed NDA with PG&E.

- a. Please refer to attachment “WMP-Discovery2023_DR_TURN_007-Q003Atch01CONF.xlsx” which is the System Hardening workplan prepared for the 2023-2026 WMP (plan dated January 3, 2023). Please see columns AH-AK and AL-AO that includes the 2025 and 2026 forecasted miles, respectively.

The estimated mileage forecasts for each sub-type of hardening (overhead, underground and line removal) will vary from the actual mileage completed in each year. Additionally, if we complete system hardening miles above the annual

targets in a particular year, we may lower future annual targets in a subsequent WMP or plan update.

b. The following are the reasons why circuit segments from Table 7-2 may not be on the undergrounding workplan:

- The circuit segment has a lower Wildfire Feasibility Effectiveness (WFE) score due to expected high undergrounding difficulty and/or bundling with other nearby circuit segments that could result in the combined WFE score for the bundled segment being relatively lower. These projects were not scoped in the workplan and remain supported by other layers of protection as described in Table 7-4 of the WMP.
- The circuit segment is shorter such that it is being bundled with other nearby circuit segment(s) to optimize construction efficiency as part of a combined project.
- The circuit segment was previously hardened (either OH or UG).
- The circuit segment is a privately owned line. We send an annual letter to the owner reminding them of their responsibility to maintain the line but do not take action on these circuits.

The following is a list of the circuit segments that were listed in Table 7-2 and an explanation why it was not included in the 2023-2026 Undergrounding Workplan:

- **Oakhurst 110310140** – This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Monticello 1101654** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years. In addition, this section has significant OH hardening that was completed following the 2020 LNU fire.
- **Balch No 1 1101105414** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Curtis 170356972** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Monticello 1101630** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years. In addition, this section has significant OH hardening that was completed following the 2020 LNU fire.
- **Calistoga 1102131531** - Currently both Calistoga circuits have REFCL enabled. Additional undergrounding in this location could compromise the

REFCL system by adding capacitance.

- **Electra 1102CB** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **French Gulch 1101CB** - This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Paradise 1103283794** – This circuit segment is included in the Community Rebuild program with portions completed in 2022 and the remainder planned for 2024. This segment is included as part of an adjacent segment Paradise 110636042, as shown in PG&E's Undergrounding workplan.
- **Paradise 11061212** – This circuit segment is included in the Community Rebuild program with portions completed in 2022 and the remainder planned for 2023. This segment is included as part of an adjacent segment on Paradise 110353544, as shown in PG&E's Undergrounding workplan.
- **Cresta 1101103126** – This circuit segment was already hardened as part of the response to the Camp Fire.
- **Cresta 1101546650** – This circuit segment was already hardened as part of the response to the Camp Fire.
- **Monticello 1101CB** – This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Indian Flat 11044440** – This segment is included in projects for an adjacent segment Indian Flat 1104CB.
- **Calpine 1144304** – This is a privately owned line and is not in scope for the 10K Undergrounding program.
- **Apple Hill 2102CB** – This is a short circuit segment included in the projects for adjacent segment Apple Hill 2102836878.
- **Middletown 1103CB** – This is a short OH circuit segment that is inside a substation. It is excluded from the targeted underground work. The tail end of this segment where it previously connected to LR 830 was hardened in 2022.
- **Placerville 210658118** – This is a short circuit segment included as part of the greater Placerville 210611132 Ph 1 project.
- **Balch No 1 1101CB** – This circuit segment had a lowered WFE score due to expected high undergrounding difficulty, and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
- **Alleghany 11021101/2** – This is a short circuit segment included as part of

the adjacent Alleghany 1102CB Nevada Ph 5 project.

- **Calpine 1144962** – This is a privately owned line and is not in scope for the 10K Undergrounding program.
- **Camp Evers 2101BL2101** – This is short circuit segment within a pad-mounted switchgear. This segment is considered hardened and was excluded from consideration.
- **Mariposa 2101929360** – This is a short circuit segment that was already hardened in 2021.

c. No, there are not discrepancies.