TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: October 7, 2026

Response Due: October 12, 2026

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Data Request Number: Energy Safety-DR-EUP-26-06

Subject: KDMM Calculations, BCR and CPUC Data Template, and Circuit Segment Length

INSTRUCTIONS

a. Provide all information in your possession, custody, or control, or the possession, custody, and/or control of your affiliates or agents, that is responsive to these data requests by the due date identified above.

b. Responses and documents may be produced and served electronically, but they shall be fully machine-readable and searchable.

c. If you have any questions about the meaning or scope of the data requests herein, direct such questions to the Energy Safety staff identified as the "Originator" of this request at your earliest opportunity.

    1. Lack of clarity on meaning or scope of requests, without prior request for clarification from the "Originator," will not be a permissible reason for incomplete responses and will be regarded as non-compliance with the request.

d. Identify the personnel (employees, consultants, agents, etc.) who provided information responsive to each of the data requests below. As used in this context herein, "identify" means to provide the full name, business address, and title of each employee, consultant, or agent who provided such information.

e. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.

f. Provide data in its original format (i.e., PDF, Excel, GIS shapefile, etc.), unless otherwise specified in the request.

g. Send your response to Dmitriy Lysak (Dmitriy.Lysak@energysafety.ca.gov), and include a copy to:

    Simone.Brant@energysafety.ca.gov,
    Shaun.Richards@energysafety.ca.gov, Richard.Cao@energysafety.ca.gov,
    Adam.Berlinerman@energysafety.ca.gov,
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h. E-file a copy of the response on the PG&E EUP Docket #EUP-PGE.

REQUEST

This Data Request pertains to the PG&E EUP.

Q01. KDMM Calculations

a. Climate Escalation
    a. Provide Baseline Wildfire Risk, Baseline EPSS Risk, and Baseline PSPS Risk without climate factors for each Circuit Segment from 2025 to 2092.
    b. Provide the Wildfire Risk, PSPS Risk and EPSS Risk climate factors for each Circuit Segment from 2025 to 2092.
    c. Provide the baseline KDMMs with climate factors applied for each Circuit Segment from 2025 to 2092.
    d. Are there different values for each HFTD tier/county/Circuit Segment?
    e. Does climate impact to Fire Weather Index (FWI) affect both EPSS and PSPS or just PSPS? Core Capability 4 states just PSPS, however WP006 states PSPS and EPSS.
    f. Provide a sample calculation to demonstrate how Climate Factors are calculated with Fire Weather Index (FWI) and Heat Day multipliers.
    g. Which KDMMs is climate escalation applied to (Likelihood/Consequence/Risk)?
b. Inflation Escalation
    a. Which KDMMs is inflation escalation applied to (Likelihood/Consequence/Risk)?
c. Plan Tracking Objectives
    a. Do the risk reduction targets represent instantaneous risk reduction for all projects completed in the given year including inflation and climate escalation up to that year? If not, what do they represent?
    b. Are values in the Plan Tracking Objectives presented in nominal values for the given year or in year 2028 present value?
d. Target/Timeline Table
    a. Footnote (d) indicates that risk values represent unmitigated and residual risk for all projects completed in a given year, however the risk columns are labeled

as Change In Instant/Cumulative Risk. Are the Change in Risk columns reporting pre/post mitigation risk or risk reduction for all projects in a given year?

b. Do the change in Instantaneous Wildfire and Outage Program Risk columns represent risk reduction for all projects completed in a given year, including climate and inflation escalation up to year 10? If not, what do they represent?
c. Are the change in Wildfire and Outage Program Risk columns presented in nominal values or in year 2028 present value?

e. Risk Model Impact Factor
    a. Do KDMM calculations in Tables 5, 8, 11, 12, 13 or 15 and the Model Risk Landscape JSON incorporate the Risk Model Impact Factor?
    b. How is the Risk Model Impact Factor applied?
        i. Is it applied to baseline KDMMs prior to calculations or to final values?
        ii. Provide an explanation and examples to demonstrate at what stage the Risk Model Impact Factor adjustment is applied to the following calculations if applicable: PMO, Plan Tracking Objectives, Target Timeline Table, etc.

Q02. Benefit-Cost Ratios (BCRs) and CPUC Data Template

a. WP006 states that PG&E is using a real discount rate of 4.61% (nominal ATWACC adjusted for inflation) for decision making. PG&E also provides discounted values under the Hybrid and Societal discount rates, consistent with the Risk-Based Decision-Making Framework (RDF).
    a. What are the “real discount rates” that were used under the Hybrid and Societal discount rate scenarios?
    b. Given that long-term expected inflation (2.28%) is greater than the Societal discount rate (2%), the “real” Societal discount rate would be a negative value. However, the 2% rate is the social rate of time preference (SRTP) estimated by the Office of Management and Budget (OMB) that is already a real rate that is

adjusted for inflation.[1] Confirm whether an additional inflation adjustment is being applied to the current 2% SRTP.

c. Per the RDF Phase 3 decision, the Hybrid discount rate incorporates the "10-year effective average inflation rate as measured by the California statewide consumer price index."[2] Confirm whether an additional inflation adjustment is applied to the Hybrid rate to derive a "real" rate when calculating BCRs.

b. Are the BCRs calculated only over the project's useful life? For all Confirmed Projects in CPUC Table 1, the useful_life for ALT1 is 48 years. However, in CPUC Table 7, ALT1 accrues costs over 55 years and not 48 years. Why is this the case?

c. PG&E has provided different "total cost" numbers in separate parts the tabular data submission. Looking only at Proj0001 Undergrounding as Scoped as an example, in Energy Safety's Screen 4 Table (Table C.13), total_costs = 17.2725. In CPUC Table 1, present_value_project_costs = 15.45557.

   a. As outlined in WP006, the denominator of the BCR is the NPV Lifetime Costs which equals the present value of installation capital costs and incremental lifetime O&M costs. Do either of the provided total cost numbers represent the NPV Lifetime Costs as defined in WP006?

   b. If the answer above is no, then describe which cost components are missing and describe how to derive the NPV Lifetime Costs from the given total_costs and present_value_project_costs values.

d. In CPUC Table 7, where costs_type = "Total CapEx" or "O&M Costs (NBB)," the reported annual_costs_in_year_1 appear to include pre-year 1 costs that were incurred.

   a. Confirm whether annual_costs_in_year_1 only includes year 1 costs or if it also includes pre-year 1 costs.

   b. If pre-year 1 costs are included with year 1 costs, provide the pre-year 1 costs broken out by year along with a revised year 1 cost for these cost_types.

e. In CPUC Table 4, the fields wildfire_rebuild_miles, associated_asset_miles, associated_assets_present_value_capital_costs, and

[1] https://www.whitehouse.gov/wp-content/uploads/2023/11/CircularA-4DiscountHistory.pdf
[2] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M533/K099/533099839.PDF, pg. 103

associated_assets_total_mitigation_benefit are listed as 0 for every Confirmed Project in the initial portfolio. Are these values correct? If so, explain the zeroes. If not, provide correct values.

f. Provide detailed inputs and steps on how the unscaled and scaled BCRs were calculated for one example rru_id from PG&E's portfolio. At a minimum, the response should include:
    a. all detailed benefit and cost lines for the complete BCR time horizon,
    b. the discounted cost and benefits for the complete BCR time horizon,
    c. the total present value of the numerator and denominator,
    d. an explanation of at which point the risk scaling function is applied and a comparison between scaled and unscaled inputs.

g. PG&E uses the BCR for 100% Undergrounding (100% UG) at the end of Screen 2 and start of Screen 3 where Circuit Segments are filtered. PG&E uses the 100% UG BCR again for the Screen 3 Benefit-Cost Comparison.
    a. Are these two 100% UG BCRs values identical? Prior to the Screen 3 Benefit-Cost Comparison, PG&E inputs scope mileage and unit cost assumptions into their Foundry WPC Feedback Loop Tool. Updated mileage and unit cost assumptions are input again following the Desktop Scoping Meeting. Does this result in revised 100% UG BCRs?
    b. If the 100% UG BCR does change, provide the revised 100% UG BCR that is utilized for the Screen 3 Benefit-Cost Comparison for all Confirmed Projects that have passed through Screen 3.
    c. As stated in WP004, each feedback loop record is assigned a status: Draft, Pre-DSM, or Final. For all Alternative Mitigations, are the BCRs reported in the Screen 4 Table the "final" BCRs following the Desktop Scoping Meeting or are they the BCRs evaluated prior to the initial Screen 3 Benefit-Cost Comparison?

Q03. 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's 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_utiltiy_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

END OF REQUEST