TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: October 21, 2026

Response Due: October 28, 2026

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Originator: David Rey
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Data Request Number: Energy Safety-DR-EUP-26-07

Subject: Wildfire Rebuild Areas & Rebuild Project Selection

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 David Rey (David.Rey@energysafety.ca.gov), and include a copy to:

    Simone.Brant@energysafety.ca.gov,
    Shaun.Richards@energysafety.ca.gov,
    electricalundergroundingplans@energysafety.ca.gov

h. E-file a copy of the response on the Electrical Undergrounding Docket #EUP-PGE.

REQUEST

Q01. Fire Rebuild Areas

a. PG&E defines a "Fire Rebuild Area" as "four or more spans of electric distribution infrastructure damaged by a fire" (PG&E EUP, p. 98). Table 24 from PG&E's Tabular Data submission, however, identifies "Wildfire Rebuild Areas" by fire event which can consist of multiple impacted circuit segments.
   i. State whether a "Fire Rebuild Area is (i) a single circuit segment, (ii) a fire event that may include multiple circuit segments, or (iii) something else.
   ii. Provide PG&E's definition of a "Fire Rebuild Area" and cite any documentation that establishes it.

b. Regarding the types of fires that qualify:
   i. Explain why PG&E uses "Fire" rather than "Wildfire" when referring to rebuild areas and projects.
   ii. State whether "Fire Rebuild Areas" and "Fire Rebuild Projects" include line damage caused by fires other than wildfires (e.g., structure or vehicle fires) (Yes/No).
      i. If yes, identify each Table 24 entry caused by a non-wildfire fire and the fire type.
      ii. If yes, explain the basis for including non-wildfire fires as eligible rebuild areas under the EUP.

c. Regarding Table 24 of PG&E's Tabular Data submission:
   i. State whether the fire events provided in Column A of this table, are PG&E's "Fire Rebuild Areas" (Yes/No). If no, identify the field that identifies "Fire Rebuild Areas."
   ii. For the data in Table 24, provide: (i) each system of record used; (ii) the validation steps performed; and (iii) how often data is updated.
   iii. Identify each government agency to which PG&E reports the fire-event or "Fire Rebuild Area" information in Table 24. For each agency, provide the agency/program receiving the information and the reporting mechanism (dataset, filing, incident report, or other). If none, state so.
   iv. For the data in Table 24, please identify fire events that occurred outside State Responsibility Areas where CalFire is the primary emergency response agency. For these entries, please identify which emergency response agency was the primary emergency response agency for the fire event.

v. Several Table 24 entries do not provide an ignition date or fire location. For each such entry, provide: (i) ignition date; (ii) location; (iii) fire cause; (iv) whether the fire was a wildfire (Yes/No); (v) HFTD/HFRA status; and (vi) supporting documentation (e.g. CAL FIRE or local fire agency incident report). If this information is not available, provide a justification on why.

vi. For fire events where "Fire Location" is provided as latitude and longitude, do the coordinates represent the point of ignition, a random spot within the fire perimeter, or something else?

vii. Please explain how PG&E determines which latitude and longitude coordinates to use to identify the location of Fire Events.

Q02. Fire Rebuild Projects

a. Provide PG&E's definition of a "Fire Rebuild Project" and cite any documentation that establishes it.

b. On p. 253 of PG&E's EUP, PG&E states that the: "status of rebuild work for wildfire areas that do not have associated system hardening work and/or is not in Fire Rebuild Areas is designated as 'N/A'."
    a. Explain how a Fire Rebuild Project could not be in a Fire Rebuild Area.
    b. Provide a specific example from a Fire Rebuild Project in PG&E's EUP

Q03. Emergency Damage and Customer Service Assessment

a. Provide PG&E's definitions of a "span" and a "segment" as used in the Emergency Damage and Customer Service Assessment (PG&E EUP Figure 3-2).

b. Provide PG&E's definition of "intermittent damage" as used in the Emergency Damage and Customer Service Assessment (PG&E EUP Figure 3-2).

c. Regarding intermittent damage:
    i. Describe the process by which intermittent damage is identified, documented, and reviewed.
    ii. Provide PG&E's procedure for determining whether damage is classified as intermittent.
    iii. Provide PG&E's procedure for calculating whether the intermittent damage exceeds 50%.

d. On p. 99 of PG&E's EUP, PG&E states that a: "Circuit Segment is only prioritized as a Fire Rebuild Project if it is reviewed according to the [Emergency Damage and

Customer Service Assessment] damage assessment process described in this paragraph and in Figure 3-2 below."

i. At what point in the assessment does circuit segment get designated a Fire Rebuild project: (i) whenever a circuit segment is reviewed, regardless of the assessment's outcome, (ii) if the circuit segment has 4 or more damaged spans or 50% intermittent damage, or (iii) something else.

Q04. Scope of Hardening Following Rebuild Project Determination

a. Provide PG&E's methodology for determining the portion of a Circuit Segment that is included within the scope of a Rebuild Project once a Circuit Segment has been determined to qualify as a Rebuild Project.
b. After a project is designated as a Rebuild Project and 100% Undergrounded is determined as the grid hardening mitigation, which of the following scenarios would occur:
   i. undergrounding of only the damaged spans or segments;
   ii. undergrounding of the entire Circuit Segment;
   iii. undergrounding of the portions of the Circuit Segment within HFTD or HFRA zones;
   iv. undergrounding of adjacent portions of unaffected Circuit Segments.

Q05. Fire Rebuild Project Risk Baselines

a. On p. 53, PG&E states: "Circuit Segments entirely outside HFTD/HFRA are excluded from the Plan Mitigation Objective."
   i. State whether PG&E would underground eligible, Non-HFTD Rebuild Projects through the EUP Program (Yes/No)
      i. If yes, state if the risk reduction achieved by undergrounding eligible, Non-HFTD Rebuild Projects would count toward the Plan Mitigation Objective (Yes/No).
      ii. If yes, state whether the miles achieved by undergrounding eligible, Non-HFTD Rebuild Projects would count toward PG&E's 4,000 undergrounding mile target (Yes/No).
b. On p.355 of PG&E's EUP, PG&E states that the "Pre-Wildfire distribution infrastructure for Fire Rebuild Projects where the fire occurred before January 1, 2023, would not be

available for baseline comparisons. See discussion of previously-scoped projects in Chapter 3, Section D.5."

i. Explain why PG&E is unable to provide this information.

ii. State whether PG&E is proposing to incorporate Fire Rebuild Projects associated with wildfire events prior to 2023 into the EUP portfolio, even if those Fire Rebuild Projects do not meet all EUP requirements (Yes/No).

    i. If yes, explain the basis for including these projects despite not meeting the EUP all requirements.

END OF REQUEST